

# FINAL REPORT



Office of Inspector General  
*Internal Audit*

Report No. AHCA-2122-02-A

December 2022

## Public Records Process Audit

### EXECUTIVE SUMMARY

As part of the Agency for Health Care Administration (Agency or AHCA) Office of Inspector General's Audit Plan, Internal Audit conducted an audit of the Agency's processes of redaction and estimating costs for public records requests. The audit encompassed all divisions in the Agency: Office of General Counsel (OGC); Office of Chief of Staff; Office of Inspector General (OIG); Division of Health Quality Assurance (HQA); Division of Medicaid (Medicaid); and the Division of Operations (Operations).

During the audit, we noted where improvements could strengthen controls in the following areas:

- The Agency does not consult uniform guidance for redacting records for public records requests, which led to the Agency releasing records with unredacted confidential and protected information.<sup>1</sup>
- Access to the Agency's correspondence tracking system and controls for emails with confidential and protected information need improvements.
- The Agency does not have a consistent formula for assessing fees<sup>2</sup> for public records requests.

The Findings and Recommendations section in this report provides details of the results of this audit. Management responses are included in the Management Response Table on pages 8 through 19.

**THIS SPACE INTENTIONALLY LEFT BLANK**

---

<sup>1</sup> Once we discovered this, we informed the Public Records Office and the HIPAA Privacy Officer.

<sup>2</sup> Section 119.07, Florida Statutes, defines allowable fees which can be assessed for preparing records for a public records request. In this report, the term "fee" and "cost estimate" are used interchangeably.

---

## OBJECTIVES, SCOPE, AND METHODOLOGY

The objective of this audit was to determine the efficiency and effectiveness of controls in place for the public records process. The scope of this audit included a review of the accuracy of the Agency's redaction process and the Agency's formula for cost estimates for public records requests for the period October 1, 2021, through March 31, 2022.

The methodology for this audit included the following:

- Review of relevant laws, rules, policies, and procedures.
- Interviews with staff in the OGC, Office of Chief of Staff, OIG, and the divisions of HQA, Medicaid, and Operations.
- Survey of records custodians<sup>3</sup> in the divisions of HQA, Medicaid, and Operations.
- Review of cost estimate documentation.
- Review of responsive records<sup>4</sup> for redaction.

## BACKGROUND

Under Chapter 119, Florida Statutes (F.S.), records made or received by any public agency in the course of its official business are available for review, unless exempt from public disclosure. Furthermore, Section 119.011(12), F.S., defines "public records" as all documents, papers, letters, maps, books, tapes, photographs, films, sound recordings, data processing software or other material, regardless of physical form, or characteristics, or means of transmission, made, or received pursuant to law or ordinance or in connection with the transaction of official business by any agency.

Public records requests (request) made to the Agency are logged into a correspondence tracking system (tracking system) by the Public Records Office (PRO), located in the OGC. The PRO staff are also responsible for routing the requests to the appropriate divisions, providing invoices to requestors, and disseminating responsive records.

There are many Agency staff involved in the public records process. AHCA Policy #99-Ex-1 defines the staff as the following:

- Public Records Coordinator (PRC): "Employee of the Public Records Office... whose primary duty is to receive all incoming public records requests directed to the Agency and coordinate responses to the requests."
- Division Coordinator (DC): "Person designated to coordinate responses to public records requests for public records created or received by the person's particular division." The policy further specifies the DC is to ensure records are appropriately redacted if necessary, before the records are given to the PRC for release.

---

<sup>3</sup> "Records custodians" is defined in the Background section in this report.

<sup>4</sup> In this report, "responsive records" is used to represent the records in any format which fit within the scope of the specific set of records requested.

- Records Custodian (RC): “Any Agency employee who has been designated by the Secretary of the Agency as the records custodian for a particular division, bureau or unit of the Agency.” The policy identifies RCs as division/bureau/unit staff who produce records responsive to a request and make all necessary redactions.

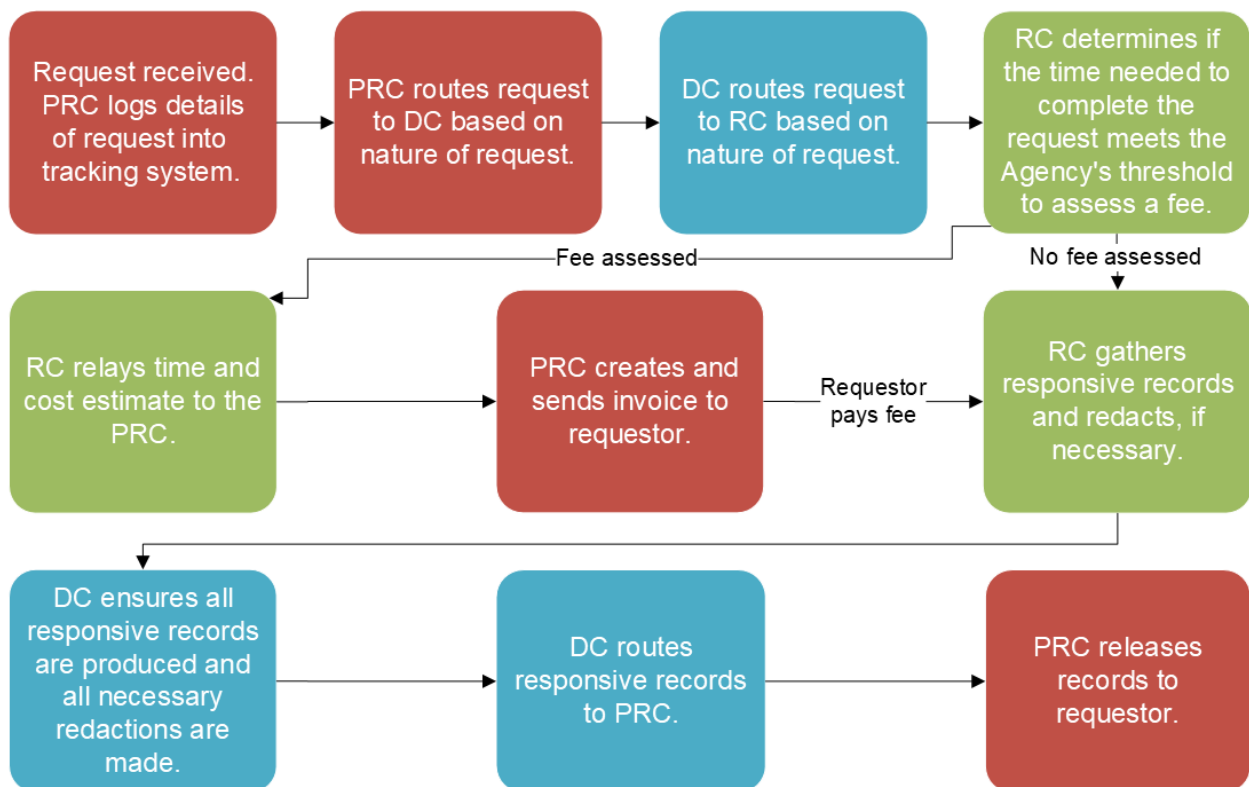
The flow chart below shows a basic rendition of the routing information for public records requests, as defined in AHCA Policy #99-Ex-1 and outlined in the detailed 2019 flow chart provided by the OGC.

**Legend**

Red - Action taken by Public Records Coordinator (PRC)

Blue - Action taken by Division Coordinator (DC)

Green - Action taken by Records Custodian (RC)



THIS SPACE INTENTIONALLY LEFT BLANK

## FINDINGS AND RECOMMENDATIONS

***Finding 1 – The Agency does not consult uniform guidance for redacting records for public records requests, which led to the Agency releasing records with unredacted confidential and protected information.***

Chapter 119, F.S., identifies information which is required to be redacted. The Code of Federal Regulations<sup>5</sup> defines identifying information<sup>6</sup> which is required to be redacted. AHCA Policy #99-Ex-1 states the DC is to ensure records are appropriately redacted before release of the records.

We sent a survey to RCs in the divisions of HQA, Medicaid, and Operations, to identify their redaction process. Based on the survey responses, Agency staff who redact records for public records requests do not consult the same guidance. We found the Agency lacks ongoing periodic training and resources for staff involved in the public records process. The Agency also does not consistently conduct a secondary or additional review of records prepared for release.

AHCA Policy #99-Ex-1, last updated in 2012, does not identify which redaction guidance resources Agency employees should consult for public records requests.

We also reviewed a sample of responsive records regarding the Agency's redaction of records for accuracy. Our review of a sample of responsive records found the Agency released unredacted confidential and protected information. Out of the 22 requests for which we reviewed responsive records, 12 of the requests contained documents with unredacted confidential and protected information.

### ***Recommendations***

We recommend the Public Records Office update AHCA Policy #99-Ex-1 to identify guidance resource information for all categories of confidential and protected information.

We recommend the Public Records Office create a public records page on the Agency's internal website to include redaction guidance for Agency staff to consult.

We recommend the Public Records Office implement ongoing periodic training for Agency staff involved in the public records process to include identifying all categories of confidential and protected information.

Additionally, we recommend the Public Records Office implement the requirement for a secondary review of records responsive to public records request prior to release and to codify the requirement in policy.

---

<sup>5</sup> 45 CFR § 164.514.

<sup>6</sup> Identifying information is a subset of information including demographic information collected from an individual or created by an entity.

***Finding 2 – Access to the Agency’s correspondence tracking system and controls for emails with confidential and protected information need improvements.***

For emails sent with confidential and protected information, the Agency’s HIPAA/HITECH Compliance Manual<sup>7</sup> requires Agency staff to type the word “Encrypt” in the subject line; our review of a sample of responsive records found the PRO did not encrypt emails as required.<sup>8</sup> Using the word "Encrypt" in the subject line ensures the required level of encryption.

We determined the Agency lacks ongoing periodic training for staff involved in the public records process – in part, concerning emails with confidential and protected information. Noncompliance with the HIPAA/HITECH Compliance Manual could lead to noncompliance with Federal HIPAA requirements.

The HIPAA/HITECH Compliance Manual requires the Agency to have in place appropriate technical safeguards to protect the privacy of confidential and protected information; in this case, the technical safeguards for the tracking system. Through interviews, we learned the Agency was unaware of the allowable restrictions in the tracking system. Restrictions can be applied to individual users and individual items in the tracking system. Without the restrictions utilized to their full extent, Agency employees are able to view confidential and protected information within the tracking system beyond the minimum necessary, resulting in noncompliance with the HIPAA/HITECH Compliance Manual.

***Recommendations***

We recommend the Public Records Office implement ongoing periodic training for Agency staff involved in the public records process to include email and technical safeguards to which staff must adhere.

We recommend the Public Records Office work with the Division of Information Technology to implement single sign-on and multifactor authentication for the correspondence tracking system.

We recommend the Public Records Office utilize and implement the correspondence tracking system’s allowable restrictions.

Additionally, we recommend the Agency implement ongoing periodic reviews of access privileges for the correspondence tracking system.

---

<sup>7</sup> The HIPAA/HITECH Compliance Manual describes the privacy law under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Health Information Technology Economic and Clinical Health (HITECH) Act, Federal Medicaid law, and the Agency’s procedures for complying with the law. All AHCA employees are required to comply with the manual.

<sup>8</sup> Upon finding this, we immediately consulted with the Agency’s Information Security Manager who provided reasonable assurance that emails with responsive records were not intercepted, concluding there was no HIPAA breach.

***Finding 3 – The Agency does not have a consistent formula for assessing fees for public records requests.***

Chapter 119, F.S., provides guidance for calculation of fees for public records requests. AHCA Policy #99-Ex-1 provides a directive for how the Agency implements the statute's calculation of fees.

We sent a survey to RCs in the divisions of HQA, Medicaid, and Operations, to identify how they calculate fees for requests. Based on the survey responses, the Agency does not consistently charge requestors for public records requests. We also reviewed cost estimates within the audit scope period for accuracy. Based on information available and provided to us, we were unable to verify the accuracy of all sampled cost estimates.

AHCA Policy #99-Ex-1, last updated in December 2012, does not provide comprehensive guidance for calculating fees for requests; this allowed Agency staff to deviate from the policy. An inconsistent Agency formula for assessing fees for requests can result in the Agency overcharging or undercharging requestors.

***Recommendations***

We recommend the Public Records Office develop a comprehensive fee structure for all public records requests, and to update AHCA Policy #99-Ex-1 to include the comprehensive fee structure.

Additionally, we recommend the Public Records Office develop a template for estimating the cost estimates for public records requests, and to require Agency staff to use the template.

***FOLLOW-UP TO MANAGEMENT'S RESPONSE***

If the Public Records Office in the Office of General Counsel does not have the authority to enforce public records policy, we recommend the Agency either move the Public Records Office to an area with the authority to enforce public records policy or grant the Office of General Counsel the authority to enforce public records policy.

***ACKNOWLEDGEMENT***

The Office of Inspector General Internal Audit staff would like to thank management and staff of the Agency's Office of General Counsel, Public Records Office, and all divisions and bureaus for their assistance and cooperation extended to our Office during this engagement.

**PROJECT TEAM**

Molly Donovan, Senior Management Analyst II, conducted the audit under the supervision of Joann Hartmann, MAT, CIGA, Senior Management Analyst Supervisor, and Karen Preacher, CIA, CFE, CIGA, Audit Director.

**THIS SPACE INTENTIONALLY LEFT BLANK**

The Agency for Health Care Administration's mission is  
Better Health Care for All Floridians.

The Inspector General's Office conducts audits and reviews of Agency programs to assist the Secretary and other agency management in fulfilling this mission.

This engagement was conducted pursuant to Section 20.055, Florida Statutes, and in accordance with the *International Standards for the Professional Practice of Internal Auditing* as established by the Institute of Internal Auditors. Please address inquiries regarding this report to the AHCA Audit Director at (850) 412-3990.

Copies of final reports may be viewed and downloaded via the internet at:  
[https://ahca.myflorida.com/Executive/Inspector\\_General/Internal\\_Audit/Reports.shtml](https://ahca.myflorida.com/Executive/Inspector_General/Internal_Audit/Reports.shtml)

Copies may also be requested by telephone at (850) 412-3990, in person, or by mail at Agency for Health Care Administration, 2727 Mahan Drive, Mail Stop #5, Tallahassee, FL 32308.

No.	Finding Statements	Recommendations	Management Responses	Anticipated Completion Date and Contacts
1	The Agency does not consult uniform guidance for redacting records for public records requests, which led to the Agency releasing records with unredacted confidential and protected information.	We recommend the Public Records Office update AHCA Policy #99-Ex-1 to identify guidance resource information for all categories of confidential and protected information.	<ol style="list-style-type: none"> <li>1. The OGC/Public Records Office will create an updated version of AHCA Policy #99-Ex-1 (“Updated Policy”) that states that AHCA employees should consult the guidance and training resources that are posted and available on the Public Records Office intranet page (once that page has been created, see below) when responding to public records requests. This solution is preferred to listing specific guidance and training resources in the Updated Policy because it gives the OGC/Public Records Office flexibility to add and/or update the list of guidance and training resources (as discussed below) without having to modify the Updated Policy and re-obtain approval (also as discussed below).</li> <li>2. Once the Updated Policy is created, the OGC/Public Records Office will submit it to the Secretary and/or Chief of Staff for approval. Such approval is necessary because the OGC/Public Records Office lacks the authority to require employees outside of the OGC/Public Records Office to review and comply with the Updated Policy.</li> <li>3. Once the Updated Policy is approved by the Secretary and/or Chief of Staff, the OGC/Public Records Office will immediately require OGC/Public Records Office employees to review it and comply with it.</li> </ol>	<p><u>OGC/Public Records Office Contacts:</u></p> <p>Andrew Sheeran, Acting General Counsel/Deputy General Counsel</p> <p>Tracy George, Chief Appellate Counsel</p> <p><u>Anticipated Completion Date:</u></p> <p>1-2. The OGC/Public Records Office will create and then submit the Updated Policy to the Secretary and/or Chief of Staff for approval within 3 months after the Public Records Office intranet page is created (as discussed below).</p> <p>3. See Management Response for timeline information.</p>



No.	Finding Statements	Recommendations	Management Responses	Anticipated Completion Date and Contacts
			<p>4. With assistance from IT, the OGC/Public Records Office will post/provide links to the following guidance and training resources to the Public Records Office intranet page (once the page is created, see below): The Sunshine Manual; The Office of Open Government; The First Amendment Foundation; The Department of State, Division of Library and Information Services; AHCA’s HIPPA Compliance Office; contact information for AHCA’s Public Records Unit; and the PowerPoint presentation on Public Records and Records Management that is currently provided to new AHCA employees during New Employee Orientation. These resources are already available to employees and afford comprehensive guidance on every aspect of the public records law.</p> <p>5. The OGC/Public Records Office may identify and/or create additional guidance and training materials over time. When additional guidance and training materials are identified or created, they will be posted to the Public Records Office intranet page (once the page is created, see below).</p> <p>6. Each unit within the Agency is the subject matter expert for the laws that govern it and which it administers, has unique knowledge of the records that it has in its custody, and has unique experience</p>	<p>4. See Management Response for timeline information.</p> <p>5. See Management Response for timeline information.</p> <p>6. Once the Audit and the OIG’s recommendations become final, the OGC/Public Records Office will submit a request via the Division Coordinators for each unit within the Division to provide a unit-specific list and thereafter will request an updated list annually. See Management Response for additional timeline information.</p>

No.	Finding Statements	Recommendations	Management Responses	Anticipated Completion Date and Contacts
			<p>in determining which categories of information, documents, and portions of documents are confidential, exempt, or otherwise protected from disclosure by law. The OGC/Public Records Office lacks this level of knowledge and specialization needed to create a comprehensive list for the Agency and/or each unit of the Agency. Accordingly, the OGC/Public Records Office will ask each unit of the Agency to provide a unit-specific list of common redactions and categories of information, documents, and portions of documents within its custody that are confidential, exempt, or otherwise protected from disclosure, with appropriate supporting citations to law. The OGC/Public Records Office will ask each unit to update its unit-specific list annually. Each unit-specific list that is provided in response to this request will be reviewed by the OGC/Public Records Office and then posted on the Public Records Office intranet page (once the page is created, see below). However, it will be up to the units whether to comply with the OGC/Public Records Office’s request; the OGC/Public Records office does not have the authority to require units located outside of the OGC/Public Records Office to provide the requested unit-specific list or to update it annually.</p>	

No.	Finding Statements	Recommendations	Management Responses	Anticipated Completion Date and Contacts
		<p>We recommend the Public Records Office create a public records page on the Agency’s internal website to include redaction guidance for Agency staff to consult.</p>	<p>The OGC/Public Records Office will work with IT to create a Public Records Office intranet page, include and/or provide links to appropriate guidance and training resources on the page (as discussed above), and periodically update the page with additional or updated guidance and training resources when identified or created (as discussed above).</p>	<p><u>OGC/Public Records Office Contacts:</u></p> <p>Andrew Sheeran, Acting General Counsel/Deputy General Counsel</p> <p>Tracy George, Chief Appellate Counsel</p> <p><u>Anticipated Completion Date:</u></p> <p>The OGC/Public Records Office contacted IT to obtain assistance with set up and design of an intranet page. The exact time frame necessary to complete the page will depend on staffing, but the OGC/Public Records Office anticipate that the page can be completed within 3 months from the date that this Audit and the OIG’s recommendations become final.</p>

No.	Finding Statements	Recommendations	Management Responses	Anticipated Completion Date and Contacts
		<p>We recommend the Public Records Office implement ongoing periodic training for Agency staff involved in the public records process to include identifying all categories of confidential and protected information.</p>	<ol style="list-style-type: none"> <li>1. The OGC/Public Records Office already provides public records and records retention training to Agency staff during New Employee Orientation (in person) and as part of the yearly Keep Informed Training (via computer).</li> <li>2. The most feasible means by which additional training can be provided to Agency employees directly involved in the public records process (including Public Records Office employees, Division Coordinators, and Records Custodians) is through a computer-based training. The OGC/Public Records Office will identify what information should be included and then work with HR to create the computer-based training, identify the employees who need it, and ensure that the training is pushed out to and completed by those employees.</li> <li>3. The OGC/Public Records Office will post a link to the new computer-based training on the Public Records Office intranet page (once the page is created, see above).</li> <li>4. The OGC/Public Records Office will include statements in the Updated Policy that persons who: <ol style="list-style-type: none"> <li>(a) a person responsible for responding to a public records request should complete the training posted and available on the Public Records Office intranet</li> </ol> </li> </ol>	<p><u>OGC/Public Records Office Contacts:</u></p> <p>Andrew Sheeran, Acting General Counsel/Deputy General Counsel</p> <p>Tracy George, Chief Appellate Counsel</p> <p><u>Anticipated Completion Date:</u></p> <ol style="list-style-type: none"> <li>1. These trainings are already in place.</li> <li>2. Within 6 months from the date this Audit and the OIG's recommendations become final, the OGC/Public Records Office will identify what information should be included in the new computer-based training and begin</li> </ol>

No.	Finding Statements	Recommendations	Management Responses	Anticipated Completion Date and Contacts
			<p>page before responding, if they have not done so in the previous 6-month period; and (2) persons regularly involved in the public records process, including Public Records Office staff, Division Coordinators, and Records Custodians should complete the training posted on the Public Records Office Intranet page semi-annually. (As discussed previously, the Updated Policy must be approved by the Secretary and/or Chief of Staff before employees located outside of the OGC/Public Records Office can be required to comply with it and, thus, can be required to take the new computer-based training).</p>	<p>working with HR to create the training.</p> <p>3. See Management Response for timeline information.</p> <p>4. See Management Response for timeline information.</p>
		<p>Additionally, we recommend the Public Records Office implement the requirement for a secondary review of records responsive to public records requests prior to release and to codify the requirement in policy.</p>	<ol style="list-style-type: none"> <li>1. The OGC/Public Records Office currently lacks the resources, including staff, to provide secondary review of the records provided to it in response to public records requests prior to their release. Currently, records that have been identified by an attorney or by an Agency unit as requiring attorney review prior to their release are assigned to an OGC attorney for review before being sent to the requestor.</li> <li>2. The Agency has requested funding that will enable it to hire two full-time attorneys to assist the OGC/Public Records Office. If this funding is obtained and the attorneys are successfully hired, the OGC/Public Records Office will be able to offer</li> </ol>	<p><u>OGC/Public Records Office Contacts:</u></p> <p>Andrew Sheeran, Acting General Counsel/Deputy General Counsel</p> <p>Tracy George, Chief Appellate Counsel</p> <p><u>Anticipated Completion Date:</u></p> <p>1-3. Not applicable. See Management Response.</p>

No.	Finding Statements	Recommendations	Management Responses	Anticipated Completion Date and Contacts
			<p>secondary review of at least some responses to public records requests.</p> <p>3. Individual units within the Agency may choose to implement their own secondary review processes.</p>	
2	<p>Access to the Agency’s correspondence tracking system and controls for emails with confidential and protected information need improvements.</p>	<p>We recommend the Public Records Office implement ongoing periodic training for Agency staff involved in the public records process to include email and technical safeguards to which staff must adhere.</p>	<p>1. All Agency employees currently receive training at New Employee Orientation and as part of the annual Keep Informed Training regarding technical safeguards for email, discs, drives, etc., to which all employees must adhere. However, the OGC/Public Records Office will include a reminder in the computer-based training that it intends to create for persons involved in the public records process (as discussed above) that these technical safeguards are equally applicable in the public records context when the records that have been requested and are being produced contain confidential information.</p> <p>2. The OGC/Public Records Office does not oversee the communications tracking system for public records but will recommend to the Office of Communications that training on technical safeguards for the tracking system be implemented. The OGC/Public Records Office will also offer to include any technical safeguards for the public records tracking system that the Office of Communications develops or recommends in the</p>	<p><u>OGC/Public Records Office Contacts:</u></p> <p>Andrew Sheeran, Acting General Counsel/Deputy General Counsel</p> <p>Tracy George, Chief Appellate Counsel</p> <p><u>Anticipated Completion Date:</u></p> <p>1. See Management Response for Findings Statement 1 regarding the creation of an additional computer-based training for persons engaged in</p>

No.	Finding Statements	Recommendations	Management Responses	Anticipated Completion Date and Contacts
			computer-based training it intends to create for persons involved in the public records process (as discussed above).	<p>the public records process.</p> <p>2. The OGC/Public Records Office will make the recommendation to the Office of Communications once the Audit and OIG's recommendations become final. See Management Response for Findings Statement 1 regarding the creation of an additional computer-based training for persons engaged in the public records process.</p>
		We recommend the Public Records Office work with the Division of Information Technology to implement single	The OGC/Public Records Office does not oversee the communications tracking system for public records but will recommend to the Office of Communications that this recommendation be implemented.	<u>OGC/Public Records Office Contacts:</u>

No.	Finding Statements	Recommendations	Management Responses	Anticipated Completion Date and Contacts
		<p>sign-on and multifactor authentication for the correspondence tracking system.</p>		<p>Andrew Sheeran, Acting General Counsel/Deputy General Counsel</p> <p>Tracy George, Chief Appellate Counsel</p> <p><u>Anticipated Completion Date:</u></p> <p>The OGC/Public Records Office will make the recommendation to the Office of Communications once the Audit and OIG's recommendations become final.</p>
		<p>We recommend the Public Records Office utilize and implement the correspondence tracking system's allowable restrictions.</p>	<p>The OGC/Public Records Office does not oversee the communications tracking system for public records but will recommend to the Office of Communications that this recommendation be implemented.</p>	<p><u>OGC/Public Records Office Contacts:</u></p> <p>Andrew Sheeran, Acting General Counsel/Deputy General Counsel</p> <p>Tracy George, Chief Appellate Counsel</p>



No.	Finding Statements	Recommendations	Management Responses	Anticipated Completion Date and Contacts
				<u>Anticipated Completion Date:</u>  The OGC/Public Records Office will make the recommendation to the Office of Communications once the Audit and OIG's recommendations become final.
		Additionally, we recommend the Agency implement ongoing periodic reviews of access privileges for the correspondence tracking system.	The OGC/Public Records Office does not oversee the communications tracking system for public records but will recommend to the Office of Communications that this recommendation be implemented.	<u>OGC/Public Records Office Contacts:</u>  Andrew Sheeran, Acting General Counsel/Deputy General Counsel  Tracy George, Chief Appellate Counsel  <u>Anticipated Completion Date:</u>  The OGC/Public Records Office will make the recommendation to the Office of Communications

No.	Finding Statements	Recommendations	Management Responses	Anticipated Completion Date and Contacts
				once the Audit and OIG's recommendations become final.
3	The Agency does not have a consistent formula for assessing fees for public records requests.	We recommend the Public Records Office develop a comprehensive fee structure for all public records requests, and to update AHCA Policy #99-Ex-1 to include the comprehensive fee structure.	<ol style="list-style-type: none"> <li>Chapter 119, Florida Statutes, and case law provide the governing fee structure for public records requests. This fee structure is reflected in the existing version AHCA Policy #99-Ex-1. The OGC/Public Records Office does not have the authority to set a fee structure different than provided by law.</li> <li>To the extent existing AHCA Policy #99-Ex-1 includes additional requirements or limitations on charges (such as not charging for request under \$5 or not imposing a special service charge for requests involving less than 30 minutes of employee work time), the OGC/Public Records Office does not have the authority to make any change to these policies.</li> <li>See the Management Response regarding the development and approval of a cost estimate worksheet (below).</li> </ol>	<u>OGC/Public Records Office Contacts:</u>  Andrew Sheeran, Acting General Counsel/Deputy General Counsel  Tracy George, Chief Appellate Counsel  <u>Anticipated Completion Date:</u>  <ol style="list-style-type: none"> <li>None applicable.</li> <li>None applicable.</li> <li>See Anticipated Completion date regarding the development and approval of a cost estimate worksheet (below).</li> </ol>

No.	Finding Statements	Recommendations	Management Responses	Anticipated Completion Date and Contacts
		<p>Additionally, we recommend the Public Records Office develop a template for estimating the cost estimates for public records requests, and to require Agency staff to use the template.</p>	<ol style="list-style-type: none"> <li>1. The OGC/Public Records Office has developed a draft cost estimate worksheet for Agency personnel to use as guidance when calculating fees to better implement the fee structure mandated by law and the existing Policy, which has already been provided to the OIG. The OGC/Public Records Office will work towards finalizing the draft.</li> <li>2. The OGC/Public Records Office does not have the authority to require units outside the OGC/Public Records Office to utilize the cost estimate worksheet, once finalized. The OGC/Public Records Office will seek approval of the cost worksheet from the Secretary and/or Chief of Staff. If approved, the OGC/Public Records Office will post the cost estimate worksheet on the Public Records Office intranet page (once the page is created, see above) and reference it in trainings (see above).</li> </ol>	<p><u>OGC/Public Records Office Contacts:</u></p> <p>Andrew Sheeran, Acting General Counsel/Deputy General Counsel</p> <p>Tracy George, Chief Appellate Counsel</p> <p><u>Anticipated Completion Date:</u></p> <p>1-2. The draft cost estimate worksheet has already been developed. The OGC/Public Records Office will finalize the draft and submit it to the Secretary or Chief of Staff for approval at the same time the Updated Policy is submitted for approval. See Management Response for additional timeline information.</p>