

---

**Audit of Orange County  
Corrections Security Guard  
Services**

---



**Phil Diamond, CPA  
County Comptroller  
Orange County, Florida**

[www.occompt.com](http://www.occompt.com)



**Report No. 510  
June 2024**

## County Audit Division

---

Wendy Kittleson, CPA, CISA, CIA

*Assistant Comptroller*

Lisa Fuller, CISA, CIA, CGAP

*Director*

Erin Boley, CPA, CIA

*Deputy Director*

## Audit Team

---

Krupali Patel, CIA, CFE

*Audit Supervisor*

Treshania Hutton

*Senior Auditor*

Aileen Resnick, CIA

*Senior Auditor*

### Orange County Comptroller's Office

#### Mission

The mission of the Orange County Comptroller's Office is to serve the citizens of Orange County and our customers by providing responsive, ethical, effective, and efficient protection and management of public funds, assets, and documents, as specified in the Florida Constitution and Florida Statutes.

#### Vision

The vision of the Orange County Comptroller's Office is to be recognized as a highly competent, cohesive team leading the quest for continuing excellence in the effective safeguarding and ethical management of public funds, assets, and documents.



# TABLE OF CONTENTS

<b>TRANSMITTAL LETTER</b> .....	<b>1</b>
<b>EXECUTIVE SUMMARY</b> .....	<b>2</b>
<b>INTRODUCTION</b> .....	<b>5</b>
Background.....	5
Audit Scope.....	7
Audit Objective.....	7
Audit Methodology .....	8
Overall Evaluation.....	8
<b>RECOMMENDATIONS FOR IMPROVEMENT</b> .....	<b>9</b>
1. Corrections Should Confirm that Hiring Requirements and Required Trainings are Timely Completed .....	9
2. Corrections Should Ensure Allied Complies with Contract Staffing Requirements .....	12
3. Corrections Should Improve Contract Compliance Monitoring .....	14
4. Corrections Should Evaluate Contract Requirements to Ensure They Align with Current Processes.....	17
5. Corrections Should Verify Guards Wear Dosimeters and Radiation Levels are Monitored.....	18
<b>ACTION PLAN</b> .....	<b>20</b>
<b>APPENDIX A — COPY OF THE ALLIED HIRING REQUIREMENT FORM</b> .....	<b>22</b>
<b>APPENDIX B — POSITIONS AND POST ASSIGNMENTS</b> .....	<b>23</b>
<b>APPENDIX C — CORRECTIONS MANAGEMENT’S RESPONSE</b> .....	<b>26</b>
<b>APPENDIX D — ALLIED UNIVERSAL SECURITY SERVICES, SYSTEMS AND SOLUTIONS MANAGEMENT’S RESPONSE</b> .....	<b>40</b>



## OFFICE OF THE COMPTROLLER

---

**ORANGE  
COUNTY  
FLORIDA**

**PHIL DIAMOND, CPA**  
County Comptroller  
County Audit Division  
Post Office Box 38  
Orlando, FL 32802  
Telephone: (407) 836-5775  
Web page: [www.occompt.com](http://www.occompt.com)

June 26, 2024

Jerry L. Demings, County Mayor  
and  
Board of County Commissioners

We conducted an audit of Orange County Contract Y17-192. Allied Universal Security Services, Systems and Solutions provides private security guard services under the Contract at Orange County Corrections' facilities. The period audited was October 2021 through May 2022.

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.

Responses to our Recommendations for Improvement were received from both the Fiscal and Operational Support Manager and Allied Universal Security Services, Systems and Solutions. The responses are included in the Appendix of this report.

We appreciate the cooperation of Orange County Corrections and Allied personnel during the audit.

A handwritten signature in blue ink, appearing to read "PMD - L".

Phil Diamond, CPA  
County Comptroller

cc: Byron Brooks, County Administrator  
Danny Banks, Deputy County Administrator  
Louis A. Quinones, Jr., Chief of Corrections  
Andrea Lowery, Fiscal and Operational Support Manager, Orange County Corrections



---

## Why This Audit Is Important

Security guards perform a vital role in protecting Orange County Corrections (Corrections) facilities, employees, inmates, and visitors. They maintain a high-visibility presence to deter illegal and inappropriate actions, identify dangerous or deadly objects, and watch for signs of suspicious behavior. In 2018, Orange County signed the security guard services contract Y17-192 (Contract) to provide security guard services at Corrections' facilities. Currently, Allied Universal Security Services, Systems and Solutions, LLP (Allied) provides these security guard services. As the Contract Administrator, Corrections is responsible for ensuring Contract requirements are met.

## What We Found

### **Corrections Ineffectively Monitored Hiring Requirements (Page 9)**

Corrections did not ensure that security guards completed all new hire requirements before they were allowed to work at Corrections' facilities.

We attempted to review hiring requirements forms for four of the 11 guards hired during the audit period. Neither Corrections nor Allied could locate hiring requirements forms for two of the four guards. Additionally, numerous requirements on the hiring requirements forms provided were marked "pending" or the completion date field was left blank. We identified issues with completing psychological evaluations, driver's license checks, 7-year employment history checks, and physical exams.

We also noted that numerous required new hire trainings were completed late or never completed for the same four guards.

### **Annual Refresher Trainings Were Not Timely Completed (Page 9)**

All guards are required to complete annual refresher trainings. We identified trainings that were not timely completed for all four guards whose records we reviewed.



These trainings included:

- Professionalism/Ethics
- Child Abuse Reporting
- Suicide Awareness/Prevention
- Emergency Procedures
- Report Writing

### **Staffing Requirements Were Not Met (Page 12)**

The Contract includes specific staffing requirements at each location, including the number of guards, hours, and armed/unarmed status. We reviewed guard staffing at each location for a four week period and identified the following issues:

- At least one female guard was absent for several shifts from the Juvenile Assessment Center (JAC) even though the Contract requires continuous female guard staffing at the JAC.
- Shifts required by the Contract were not covered. Additionally, guards worked shifts that were either not required by the Contract or timings that differed from Contract requirements.
- A guard without a Class "G" firearms license worked in an armed role for several shifts.
- One guard reported working in two locations at one time.

### **Corrections' Performance Monitoring Plan Needs Improvement (Page 14)**

Although Corrections performs an annual compliance review to assess Allied's Contract compliance, no written procedures exist for conducting the review. Since procedures have not been developed, the reviews are performed inconsistently, and higher-risk requirements are not reviewed. Additionally, based on the number of issues identified with the compliance checklist, it is not an effective tool for monitoring contract compliance.

### **Quarterly Screener Testing Was Not Performed by Allied (Page 14)**

Corrections did not confirm that Allied performed quarterly screener testing. Although all screeners should be tested quarterly, none of the screeners were tested during the audit period.



---

**Contract Requirements Do Not Align with Current Processes (Page 17)**

Some Contract requirements are inconsistent with current practices that were verbally approved by Corrections personnel. If the scope and nature of services required from Allied have changed, the Contract should be amended.

**Guards Did Not Wear Dosimeters to Track Radiation Exposure Levels (Page 18)**

Allied failed to ensure that all security guards at screening posts wore a dosimeter from at least October 2021 to April 2022. Corrections did not confirm that Allied was providing dosimeters to guards as required by the Contract.

**Overall Evaluation (Page 8)**

Based on the results of our testing, Allied did not fully comply with the Contract requirements. Corrections monitoring needs improvement to identify and correct Contract noncompliance promptly. We have identified some areas for improvement in this report's Recommendations for Improvement section.



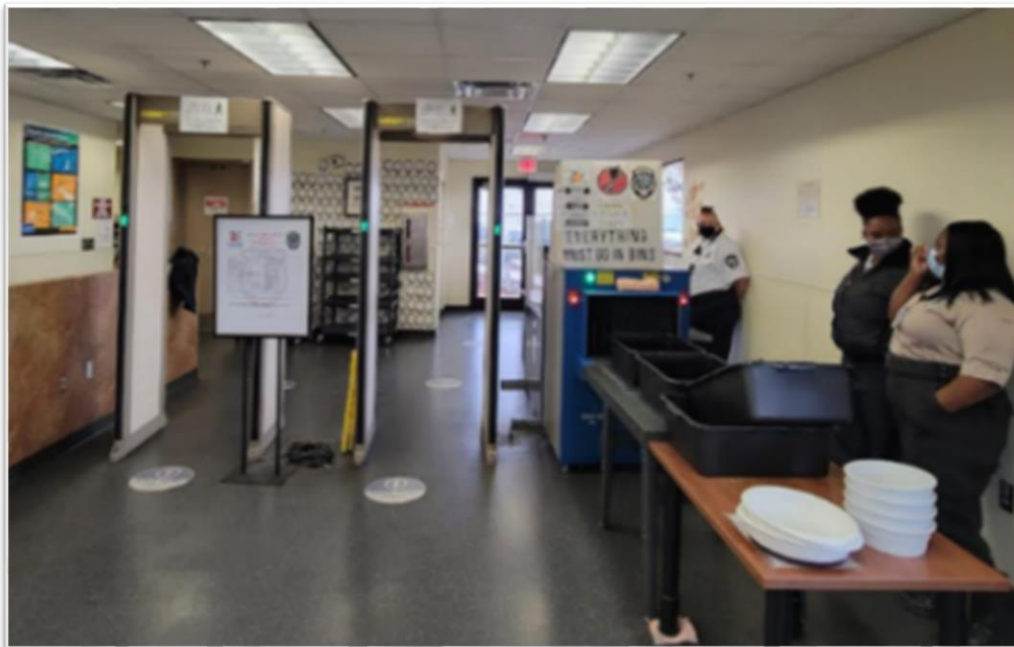
## INTRODUCTION

---

### Background

Corrections is responsible for providing a safe and secure environment for employees, inmates, and visitors at its facilities. As part of this responsibility, Corrections administers the Contract for security guard services.

Security guards screen all visitors and employees entering Corrections' sites to identify dangerous or deadly objects and prevent those objects from being carried into a facility. The Contract requires Allied to test security guards quarterly to confirm the security effectiveness of x-ray operators.



Corrections' role is to ensure that Allied complies with the terms of the Contract and assess Allied's work against measurable performance standards. The Contract stipulates that Corrections will develop a Performance Monitoring Plan (PMP) to assess Allied's performance and provide feedback and performance evaluations.

### Contract History

In March 2018, Corrections contracted with G4S Secure Solutions, USA, Inc. to provide security guard services. Subsequently, Allied Universal Security Services,





## INTRODUCTION

Systems and Solutions, LLP (Allied) acquired G4S. As a result, the security guard services contract Y17-192 (Contract) transitioned to Allied in October 2021.

The \$5.5 million Contract was effective for three years with optional one-year renewals for a maximum of five additional years. The first amendment increased the total Contract amount from \$5.5 to \$5.7 million. Subsequent amendments increased the number of guards and hourly rates in accordance with the Consumer Price Index. Corrections has renewed the Contract for two one-year terms.

During the audit period, approximately 52 security guards provided services at various Corrections’ facilities, including:

- Juvenile Assessment Center (JAC) — Security guards are responsible for juvenile intake and detention services. This includes photographing, screening, fingerprinting, and checking for outstanding warrants.
- Corrections Administration Building, Booking and Release Center, and Video Visitation Center — Security guards provide entrance security and screening services at these locations.

### **Security Guard Requirements and Staffing**

Allied must use properly trained guards who meet the qualifications specified in the Contract. Allied conducts background checks, verifies guards hold active licenses, and provides initial training. Allied is required to provide proof that all hiring requirements have been met before a security guard is allowed to work.

The security guard staffing and licensing requirements vary by location.

Security Guard Assignment	Armed/ Unarmed	License(s) Required	Number of Guards	Days/Hours
Corrections Complex Site Supervisor	Armed	Class “D” and “G”	1	M-F 7a-6p
Corrections Administration	Unarmed	Class “D”	1	M-F 6a-6p
Corrections Administration	Armed	Class “D” and “G”	1	M-F 6a-6p
Booking and Release Center	Unarmed	Class “D”	6	M-F 8a-5p



## INTRODUCTION

---

Booking and Release Center	Unarmed	Class "D"	1	M-F 5p-8a
North Perimeter Building	Unarmed	Class "D"	1	Daily 24hr/day
North Perimeter Building	Unarmed	Class "D"	2	5 hr/day for high traffic <sup>1</sup>
South Perimeter Building	Unarmed	Class "D"	1	Daily 24hr/day
South Perimeter Building	Unarmed	Class "D"	3	5 hr/day for high traffic
Video Visitation Center	Armed	Class "D" and "G"	1	Daily 8a-10p
JAC Security Manager	Unarmed	Class "D"	1	M-F 8a-4p
JAC Shift Supervisor	Unarmed	Class "D"	1	M-F 3p-7a Sa-Sun 24hr
JAC Security Officer	Unarmed	Class "D"	2	Daily 24hr/day

### Audit Scope

The audit's scope was limited to Corrections' monitoring procedures related to compliance with Orange County Contract Y17-192 for security guard services. The audit period was from October 2021 through May 2022.

### Audit Objective

The objective of the audit was to assess Allied's compliance with the Contract to provide security guard services at Corrections' facilities. In addition, the audit evaluated whether Corrections effectively monitored Allied's compliance.

---

<sup>1</sup> High traffic times are 5:30a-8a and 5p-7:30p



## INTRODUCTION

---

### Audit Methodology

To meet the audit objectives, we performed the following testing:

- Identified security guards who worked under the Contract during the audit period.
- Verified that a sample of new hires met the minimum hiring and training requirements before performing their duties.
- Verified that refresher trainings were completed for a sample of security guards.
- Reviewed Florida Department of Agriculture and Consumer Services database license information to verify that a sample of guards had active Class "D" Security Officer or Class "G" Statewide Firearm license(s).
- Reviewed invoices and supporting timesheets to validate:
  - Invoices were approved by Corrections prior to payment,
  - Billed hours agreed to the supporting timesheets, rates agreed to the Contract, and total fees charged were clerically accurate,
  - Each post was staffed with the appropriate number and type of security guard(s) during the times and days specified,
  - Security guards were not billed for more than one location at the same time, and
  - At least one female security officer worked at JAC for all shifts.
- Reviewed documents to confirm Corrections effectively monitored Contract performance.

### Overall Evaluation

Based on the results of our testing, Allied did not fully comply with the Contract's requirements. Corrections' monitoring needs improvement to identify and correct Contract noncompliance promptly. We have identified some areas for improvement in this report's Recommendations for Improvement section.

**1. Corrections Should Confirm that Hiring Requirements and Required Trainings are Timely Completed**

When a new security guard is hired, several requirements must be met before they are allowed to work at any post. The Contract requires each guard to:

- ✓ Pass background and criminal history checks;
- ✓ Maintain an appropriate security guard license; and,
- ✓ Successfully complete all new hire training.

**Contractor Responsibilities  
for Newly Hired Guards**



Background Checks



Initial Trainings



Proof of Licensure

**Pre-Hire Screenings:**

Allied completes a hiring requirements form documenting the date each requirement is completed. [Appendix A](#) includes an example of a hiring requirements form. Allied forwards the hiring requirements form with background check results to Corrections when the guard is ready to start working. However, Corrections does not review the hiring requirements form to ensure the requirements are satisfied.

We identified the following Contract requirements which are not included on the hiring requirements form:

- Military discharge verification
- Education verification

During the audit period, eleven security guards were hired to work at Corrections. We selected a sample of four of the eleven guards for testing. Neither Corrections nor Allied could provide the hiring requirements form for two of the four guards. As a result, we are unable to confirm that the hiring requirements were met for those two guards.

After reviewing the hiring requirements forms and supporting records for the remaining two guards, we identified the following issues:

- One guard did not complete the psychological exam until 13 days after the guard’s starting date. The guard started working at JAC on 3/23/22. However, the psychological exam was not completed until 4/5/22. The

---

psychological exam results stated “Clinical Interview Recommended” which requires further evaluation by a physician. However, Allied could not provide documentation that further evaluation was ever performed.

- The other guard did not meet multiple hiring requirements before starting work, including:
  - A driver’s license check was not completed for sixteen days.
  - The 7-year employment history check was performed 111 days late.
  - Physical exam was not completed for 146 days.

When Allied submitted the hiring requirements forms to Corrections, numerous requirements were marked “pending” or the date field was blank. Since Corrections does not review the hiring requirements form, the missing screenings were not timely identified. Failure to complete required screenings before guards start working at their posts could risk the safety of hired guards, Corrections employees, inmates, and the general public.

### **New Hire Training**

All guards have basic training requirements that must be completed before working at any location. We reviewed training requirements compliance for the same four guards noted above. We determined the following trainings were not completed by two of the four guards:

- Protection of Facility, Philosophy, and Expectations training
- Handling Special Situations training
- Report Writing training

The Contract also requires new hires to complete job-specific training based on their assigned locations. We determined the following trainings were completed late or not at all:

- For the two guards assigned to JAC:
  - Florida Crime Information Center/National Crime Information Center (FCIC/NCIC) training was completed 69 and 115 days after the guards’ first day.
  - Suicide Prevention Training was completed 65 and 78 days after the guards’ first day.
- For the two guards assigned to Corrections Complex/Video Visitation Center, neither guard successfully completed the 40-hour On-The-Job training.



New hire training is not included on the hiring requirements form. Corrections uses the compliance checklist to review new hire training compliance. The compliance checklist might not be forwarded to Corrections for up to a year after a guard is hired. Thus, it is not an effective tool for verifying that new hire requirements were met. Untimely or non-completion of new hire trainings could affect the quality of security services and jeopardize the safety of hired guards, Corrections employees, inmates and visitors.

### **Annual Refresher Training at Juvenile Assessment Center**

In addition to new hire trainings, all guards working at the JAC are required to complete a minimum of 16 hours of annual refresher training. Allied documents training completion dates on the compliance checklist.

We identified 13 guards who worked at the JAC during the audit period. We reviewed the compliance checklists and training certificates for a sample of 4 of the 13 guards. We identified the following issues related to annual refresher training:

- The compliance checklists did not include both Professionalism/Ethics and Child Abuse Reporting trainings. If the training is not included on the compliance checklist, Corrections is unable to monitor compliance. After reviewing Allied's training records, we determined two of the four guards have not completed the Professionalism/Ethics training since 2018 and 2020. Child Abuse Reporting training was never completed by any of the four guards.
- One guard completed Protective Action Response (PAR) training over eight months late.<sup>2</sup>
- One guard has not completed Suicide Awareness/Prevention training since September 2018. Two additional guards had not completed this training for over two years.
- All four guards were between one and seven years past due for both Emergency Procedures and Report Writing trainings.

Additionally, the dates recorded on the compliance checklists were inaccurate or training records could not be provided for some of the trainings noted above. Untimely or non-completion of high-risk refresher trainings could result in

---

<sup>2</sup> PAR training was due 02/19/2022. However, training was not completed until 11/02/22.



---

inadequate performance of security services putting the safety of employees, visitors and inmates at risk.

---

### **Recommendation No. 1:**

Corrections should:

- A) Ensure the hiring requirements form includes all hiring requirements according to the Contract;
  - B) Review the hiring requirements forms to confirm all hiring requirements are completed before guards report for duty;
  - C) Confirm newly hired guards complete the required trainings before working at Corrections;
  - D) Develop procedures to ensure that required refresher training is timely completed; and,
  - E) Retain documentation of completed hiring requirements forms and trainings.
- 

### ***Management's Response:***

*Concur. See [Appendix](#) for full response.*

## **2. Corrections Should Ensure Allied Complies with Contract Staffing Requirements**

The Contract details specific staffing requirements for each location within the Corrections complex.<sup>3</sup> These requirements include both armed and unarmed guards for each location. The Contract also requires at least one female guard to be present at the JAC at all times.

We reviewed staffing at all Corrections locations under the Contract for a four week sample of the audit period. We compared the timesheets to the contractual staffing requirements and identified the following:

---

<sup>3</sup> [Appendix B](#)

## RECOMMENDATIONS FOR IMPROVEMENT



- No female officers were present at JAC for approximately 80 hours.
- Multiple instances of one or more guard(s) missing for an entire shift according to the Contract's staffing requirements. However, since multiple guards were assigned to some posts, no post was completely unguarded.
- The start and end times specified in the Contract differed from the start and ending times worked.
- Guards worked during times not required by the Contract.
- One guard without an active Class "G" firearms license was billed as an armed guard at the Corrections Complex.
- One guard recorded time at two separate locations at one time for a total of one hour and twenty minutes. The double billing was not identified during the invoice review.



A female officer was not present for several shifts at the Juvenile Assessment Center

As a result of staffing shortages, Corrections management stated that changes were made to the Contract's staffing requirements. However, these changes were only verbally communicated to Allied. A written amendment was not completed.

In addition, we compared the verbal requirements provided to us by Corrections to the actual staffing for one week at one location. Although the number of staffing issues decreased, there were no changes in the number of guards who missed an entire shift. As a result, Allied did not comply with the written or verbal Contract staffing requirements.

Changes to contractual requirements should be made in writing and approved by both Allied and Corrections to ensure both parties agree with the new terms and that adequate staffing of guards is maintained. As the Board of County Commissioners approves this Contract, significant changes should be presented to the Board of County Commissioners for approval. Inadequate staffing could increase the risk of improper entry. That could jeopardize the safety of Orange County Corrections employees, inmates, and visitors.



---

## **Recommendation No. 2:**

Corrections should:

- A) Review the current staffing requirements, including the need for both armed and unarmed guards, and ensure that any current or future changes to the Contract are appropriately approved and communicated;
  - B) Ensure that Allied staffs at least one female guard at the JAC at all times; and,
  - C) Confirm that all guards assigned to an armed post hold an active Class "G" firearms license prior to assignment.
- 

### ***Management's Response:***

*Concur. See [Appendix](#) for full response.*

## **3. Corrections Should Improve Contract Compliance Monitoring**

The Contract states:

*"Orange County will develop in coordination with Allied for Security Guard Services a Performance Monitoring Plan (PMP) which establishes provisions for the Security Guard Services contract. The PMP will describe a checklist of items as well as the methodology for assessing Allied's Performance and will be used to provide appropriate feedback and contract performance evaluations."*

To meet the requirement, Corrections performs three monitoring activities:

- Annual Contract compliance review
- Ad-hoc screener observations
- Quarterly surveys

As part of the audit, we reviewed these monitoring activities to evaluate their effectiveness.

---

## **Annual Contract Compliance Review**

Allied documents the following information for all guards assigned to Corrections on the compliance checklist:

- ✓ Full name
- ✓ Hire and termination dates
- ✓ License numbers
- ✓ New hire screening and training completion dates
- ✓ Refresher training completion dates

Allied forwards the compliance checklist to Corrections for review annually. Corrections staff stated that a sample of guards is selected to verify that completion dates are supported, license numbers are accurate and active, and trainings are timely completed. However, written procedures for these annual compliance reviews have not been developed.

We reviewed Corrections' annual compliance review performed in May 2022. As part of the review, Corrections reviewed documentation for seven of the 52 guards listed on the compliance checklist. We identified the following issues with the annual compliance review:

- The list of guards on the compliance checklist is not compared to the guards working at Corrections to verify all guards are included. We identified two active security guards not included on the compliance checklist.
- Completion dates were not included on the checklist. Some fields were blank or pending/passed was recorded.
- None of the armed guards in positions that require an additional Class "G" firearms license were selected for review.
- The number of Contract criteria reviewed for each selected guard was inconsistent. Only one criteria was reviewed for one guard. However, 23 different criteria were reviewed for another guard. Interestingly, the guard with only one criteria reviewed worked at the JAC Center — a higher-risk location requiring direct contact with juveniles.
- Class "D" security guard license expiration dates were not reviewed for four of the selected security guards — even though all guard positions require Class "D" licenses.



- 
- Inapplicable requirements were reviewed for the selected guards. For example:
    - None of the seven security guards selected worked at an armed post. However, Class "G" firearms licensing was reviewed for three of the guards.
    - Psychological exam completion is only required at hire. This was not reviewed for the one new hire selected. However, the completion date was reviewed for another guard who was hired over 10 years ago.
  - Documentation of the annual review and related results for one of the seven selected guards was not retained by Corrections.

Without written procedures, review procedures may be inconsistent or inadequate.

As noted in recommendation #1, several new hire screenings, new hire trainings, and refresher trainings were not completed or were completed late. Throughout testing, we identified compliance checklist information that was blank, input inaccurately, or that could not be supported by source documents. Based on the number of issues identified with the compliance checklist, it is not an effective tool for monitoring contract compliance.

### **Screener Observation and Testing**

The Contract requires Allied to perform quarterly screener testing. Test completion certification, test results, and any planned or completed corrective action should be retained in the officers' personal folders.

During the audit period, we discovered that Allied did not complete any quarterly screener testing. However, Corrections performed limited screener observations as part of the PMP. Documentation to support the observations performed, corresponding results, corrective action plans, and reporting results to Allied was not consistently maintained. Corrections did not identify that Allied was not completing screener testing as part of their PMP.

Without consistent screener testing, guard screening effectiveness cannot be assessed to determine whether guards are operating effectively or if additional training is needed.



---

### **Quarterly Surveys**

Corrections performs quarterly surveys to assess whether Allied is providing services in accordance with the Contract. The survey requires an evaluation of Allied's performance by answering yes/no questions and evaluating Allied's performance on a scale of 1 to 10. We selected two quarterly surveys to review. We determined that the survey for the quarter ended December 2021 was not conducted. However, the following quarter's survey was performed.

---

### **Recommendation No 3:**

Corrections should:

- A) Evaluate the current Performance Monitoring Plan to ensure it adequately evaluates Allied's Contract compliance. This should include quarterly screener testing;
- B) Prepare written documentation of the Performance Monitoring Plan including key areas for review, procedures to be performed, timing, documenting and communicating results, and required corrective actions; and,
- C) Ensure completed review documentation is maintained.

---

### ***Management's Response:***

*Concur. See [Appendix](#) for full response.*

### **4. Corrections Should Evaluate Contract Requirements to Ensure They Align with Current Processes**

We identified the following instances where Contract requirements did not align with current operations:

- Although guards assigned to the JAC are completing the 40 hour On-The-Job training, the Contract should be amended to require this training.
- The Contract requires FCIC/NCIC training to be completed annually. However, the certifications only expire every two years.
- The Contract specifies that "the Performance Monitoring Plan includes applicable Functional Assessment Plans and associated Performance Assessment Worksheets to document and report Orange County's



---

observations and rate contractor performance.” Instead, Corrections performs three different monitoring activities as described in Recommendation #3.

According to Corrections management and Allied, some of the information in the Contract is outdated and should be updated. Without amending the Contract, Allied may not perform requirements as intended. Alternatively, Contract requirements may be performed by both parties.

---

**Recommendation No. 4:**

Corrections should work with County Administration to amend the Contract to ensure it aligns with current operations.

---

***Management’s Response:***

*Concur. See [Appendix](#) for full response.*

**5. Corrections Should Verify Guards Wear Dosimeters and Radiation Levels are Monitored**

A dosimeter is a small device worn to detect and measure radiation exposure levels. Allied is required to provide dosimeters to guards working at screening checkpoints where X-ray machines are used. Additionally, Allied is required to evaluate each dosimeter monthly and maintain the results of evaluations.

We observed guards working with X-ray machines that were not wearing a dosimeter. Audit determined that dosimeters were not provided to any guards between October 2021 and April 2022. As a result, no monthly dosimeter evaluations were completed during this time, and the radiation exposure levels were not evaluated.

Inadequate monitoring of radiation exposure levels could lead to untimely detection of abnormal radiation levels compromising the health and safety of contracted guards.



---

**Recommendation No. 5:**

Corrections should implement a process to confirm that Allied complies with Contract requirements for monitoring radiation levels.

---

***Management's Response:***

*Concur. See [Appendix](#) for full response.*

# ACTION PLAN



NO.	RECOMMENDATIONS	MANAGEMENT'S RESPONSE		
		CONCUR	PARTIALLY CONCUR	DO NOT CONCUR
1.	Corrections should:			
A)	Ensure the hiring requirements form includes all hiring requirements according to the Contract;	✓		
B)	Review the hiring requirements forms to confirm all hiring requirements are completed before guards report for duty;	✓		
C)	Confirm newly hired guards complete the required trainings before working at Corrections;	✓		
D)	Develop procedures to ensure that required refresher training is timely completed; and,	✓		
E)	Retain documentation of completed hiring requirements forms and trainings.	✓		
2.	Corrections should:			
A)	Review the current staffing requirements, including the need for both armed and unarmed guards, and ensure that any current or future changes to the Contract are appropriately approved and communicated;	✓		
B)	Ensure that Allied staffs at least one female guard at the JAC at all times; and	✓		
C)	Confirm that all guards assigned to an armed post hold an active Class "G" firearms license prior to assignment.	✓		
3.	Corrections should:			
A)	Evaluate the current Performance Monitoring Plan to ensure it adequately evaluates Allied's Contract compliance. This should include quarterly screener testing;	✓		
B)	Prepare written documentation of the Performance Monitoring Plan including key areas for review, procedures to be performed, timing, documenting and communicating results, and required corrective actions; and,	✓		
C)	Ensure completed review documentation is maintained.	✓		
4.	Corrections should work with County Administration to amend the Contract to ensure it aligns with current operations.	✓		

# ACTION PLAN



NO.	RECOMMENDATIONS	MANAGEMENT'S RESPONSE		
		CONCUR	PARTIALLY CONCUR	DO NOT CONCUR
5.	Corrections should implement a process to confirm that Allied complies with Contract requirements for monitoring radiation levels.	✓		





**APPENDIX A: COPY OF THE ALLIED HIRING REQUIREMENTS FORM**

**AUS Employee Staff Hiring Requirements**

Name: [REDACTED]	Completion Date	Comments	Recertification (If Required)
Date Hired	[REDACTED]		
D.O.B.	[REDACTED]		
Race	[REDACTED]		
Gender	[REDACTED]		
Background Completed FSA Compliance & Investigative	Pending		
E-verify completed (employment authorized)	[REDACTED]		
Driver's License Check	Pending		
FDLE check	[REDACTED]	[REDACTED]	
Social Security Check	[REDACTED]	[REDACTED]	
Multi-Jurisdictional Criminal/Sex Offender Registry Check	[REDACTED]		
Credit check	[REDACTED]		
7-year Employment History check	Pending		
Reference check	Pending		
Fingerprinting	State of Florida		
FCIC/NCIC records	State of Florida		
Minimum 9-panel drug test	[REDACTED]		
Physical Completed by Central Care	Pending		
Psychological Examination 370 Questions	Pending		
Security Officer Profile Test	N/A		
Orange County Background	Pending		
D LIC	TEMP		
EXP Date	TEMP		
G LIC	N/A		
EXP Date	N/A		
PAR Trng Expiration Date	TBD		
CPR FIRST AID & AED Expiration Date	TBD		
FCIC / NCIC Certification Date	N/A		
Suicide Awareness Expiration Date	TBD		
PREA Expiration Date	TBD		
Corrections Orientation Date	TBD		
Security Addendum	N/A		
Annual Refresher Training Due by	N/A		
40 Screener Trng	TBD		
Quarterly Screener Testing	N/A		

District Manager Signature indicates that the candidate is approved to hire pending OCCD background check and issuance of a County ID badge.  
 Signature: [REDACTED] Date: 03-10-22



**APPENDIX B — POSITIONS AND POST ASSIGNMENTS**

**CORRECTIONS COMPLEX AND JUVENILE ASSESSMENT CENTER POSITIONS AND POST ASSIGNMENTS**

- A. Corrections Complex
  - 1) One (1) Armed Site Supervisor
    - a) 10 hours a day Monday through Friday
    - i) 7:00am-5:00pm
    - b) Total hours per week- 50 hours (Armed Site Supervisor Rate)
- B. Corrections Administration, 3741 Vision Blvd, Orlando, FL
  - 1) One (1) Unarmed Security Officer for screening duty at the Building. Entrance
    - a) 12 hours a day Monday through Friday
    - i) 6:15am-6:15pm
    - b) Total hours per week- 60 hours (Security Officer Rate)
  - 2) One (1) Armed Security Officer for building security.
    - a) 12 hours a day Monday through Friday
    - i) 6:15am-6:15pm
    - b) Total hours per week – 60 Hours (Armed Security Officer Rate)
- C. Booking and Release Center, 3663 S. John Young Pkwy, Orlando, FL
  - 1) Three (3) Unarmed Security Officers for duty at Lobby Scanning Line.
    - a) 9 hours a day Monday through Friday
    - i) 8:00am-5:00pm
    - b) Total hours per week – 135 Hours (Security Officer Rate)
  - 2) Three (3) Unarmed Security Officers one each for Courtroom duty three separate Courtrooms
    - a) 9 hours a day Monday through Friday
    - i) 8:00am-5:00pm
    - b) Total hours per week – 135 Hours (Security Officer Rate)
  - 3) One (1) Unarmed Security Officer for BRC lobby night.
    - a) 15 hours a day Monday through Friday
    - i) 5:00pm-8:00am
    - b) 24 hours per day Saturday, Sunday, and Holidays
    - c) Total hours per week – 123 Hours (Security Officer Rate)
- D. North Perimeter Building, 3503 S. John Young Parkway, Orlando, FL
  - 1) One (1) Unarmed Security Officer for entrance area screening.
    - a) 24 hours a day, Sunday through Saturday
    - b) Total hours per week – 168 Hours (Security Officer Rate)
  - 2) Two (2) Unarmed Security Officers for entrance area screening.
    - a) 2.5 hours a day Monday through Friday
    - i) 5:30am-8:00am
    - b) Total hours per week- 25 Hours (Security Officer Rate)
  - 3) Two (2) Unarmed Security Officers for entrance area screening.
    - a) 2.5 hours a day Monday through Friday



- i) 5:00pm-7:30pm
- b) Total hours per week – 25 hours (Security Officer Rate)
- 4) Two (2) Unarmed Security Officers for entrance area screening.
  - a) 2 hours a day Saturday and Sunday
    - i) 5:30am- 7:30am
    - b) Total hours per week – 8 hours (Security Officer Rate)
- 5) Two (2) Unarmed Security Officers for entrance area screening.
  - a) 2 hours a day Saturday and Sunday
    - i) 5:30pm-7:30pm
    - b) Total hours per week – 8 Hours (Security Officer Rate)
- E. South Perimeter Building, 3803 Vision Blvd, Orlando, FL
  - 1) One (1) Unarmed Security Officer for entrance area screening.
    - a) 24 hours a day, Sunday through Saturday
    - b) Total hours per week – 168 Hours (Security Officer Rate)
  - 2) Three (3) Unarmed Security Officers for entrance area screening.
    - a) 2.5 hours a day Monday through Friday
      - i) 5:30am-8:00am
      - b) Total hours per week – 37.5 Hours (Security Officer Rate)
  - 3) Three (3) Unarmed Security Officers for entrance area screening.
    - a) 2.5 hours a day Monday through Friday
      - i) 5:00pm-7:30pm
      - b) Total hours per week – 37.5 Hours (Security Officer Rate)
  - 4) Three (3) Unarmed Security Officers
    - a) 2 hours a day Saturday and Sunday for entrance area screening.
      - i) 5:30am-7:30am
      - b) Total hours per week – 12 Hours (Security Officer Rate)
  - 5) Three (3) Unarmed Security Officers for entrance area screening
    - a) 2 hours a day Saturday and Sunday
      - i) 5:30pm-7:30pm
      - b) Total hours per week– 12 Hours (Security Officer Rate)
- F. Video Visitation Center staffing requirements
  - 1) One (1) Armed Security Officer for monitoring activities at the Video Visitation Center
    - a) 14 hours a day Sunday through Saturday
      - i) 8:00am-10:00pm
      - b) Total per week – 98 Hours (Armed Security Officer Rate)
- G. Juvenile Assessment Center
  - 1) One (1) Security Manager
    - a) 8 hours a day Monday through Friday
      - i) 8:00am-4:00pm
      - b) Total hours per week – 40 Hours ( Security Manager Rate)
  - 2) One (1) Shift Supervisor
    - a) 16 hours a day Monday through Friday



- i) 3:00pm-11:00pm
  - ii) 11:00pm-7:00am
- One (1) Shift Supervisor
- a) 24 hours a day Saturday through Sunday
    - i) 7:00am-3:00pm
    - ii) 3:00pm-11:00pm
    - iii) 11:00pm-7:00am
  - b) Total per weeks – 168 Hours (Shift Supervisor Rate)

- 3) Two (2) Security Officers
  - a) 24 hours a day Sunday through Saturday
    - i) 7:00am-3:00pm
    - ii) 3:00pm-11:00pm
    - iii) 11:00pm-7:00am
  - b) Total per weeks – 24 Hours ( Security Officer Rate)
  - c) (1) Security Officer – (40) Hours per Week, Sunday through Saturday, (will be assigned as a 3rd officer on shift during peak operational/booking hours as determined by management)

**Minimum staffing of Security Officers assigned to the JAC may be reduced from three staff (3) to (2) staff only in instances when security escort, via ambulance, to a hospital is necessary. In all cases, a female staff shall remain on site at the JAC. Upon being properly relieved at the hospital, The Security Officer shall return immediately to the Juvenile Assessment Center.**

Additional contingency hours (billed at regular hourly rates) are built into all positions that are on the Fee Schedule and shall be used for court appearances, hospital security contingencies, etc. All contingency hours shall be pre-approved by Orange County, Additional hours used shall be well documented with reason codes included on the invoice prior to submitting the invoice to the County for payment.

The Contractor shall bill and invoice each post separately on a weekly basis and forward the invoice and backup documentation to the Security Operations designated point of contact for review and validation.

At such time as deemed appropriate, Orange County Corrections retains the right to add contracted staff to the Department's time management clock process for the purposes of tracking staff hours worked and in/out punches.





Orange County Corrections Department, Fiscal and Operational Support Division  
**ANDREA J. LOWERY, MANAGER**

P.O. Box 4970, Orlando, Florida 32802-4970  
Phone: 407-836-3511 • Fax: 407-836-3091 • [Andrea.Lowery@ocfl.net](mailto:Andrea.Lowery@ocfl.net)

**Interoffice Memorandum**

To: Wendy Kittleson, CPA, CISA, CIA, Assistant Comptroller  
Orange County Comptroller’s Office

Through: Louis A. Quinones, Jr., Chief of Corrections   
Orange County Corrections Department

From: Andrea Jones Lowery, Manager of Fiscal & Operational Support   
Orange County Corrections Department

Date: June 17, 2024

**Subject: Response to Audit of Corrections Security Guard Services**

In response to the audit of Corrections Security Guard Services conducted by the Orange County Comptroller’s Office, this audit has allowed Orange County Corrections Department (OCCD) to streamline the review process and monitoring compliance. The working relationship between OCCD and Allied Universal demonstrates better transparency and a positive step towards excellence in all recommendations during the audit. Monthly meetings are conducted to discuss concerns, opportunities, and procedures. We have made some sufficient changes due to the audit. Please see our responses below:

**Recommendation No. 1**

**Corrections should:**

- A) Ensure the hiring requirements form includes all hiring requirements according to the Contract;**

**Response: CONCUR.**

Prior to the audit, OCCD had implemented an onboarding checklist for contractors. However, the verification process included several exceptions to assist Allied Universal with hiring staff during staffing shortages. The Allied Universal Guard Applicant Checklist (hiring requirements form) was updated during the audit to ensure that all applicant initial hiring information is completed prior to candidate information being forwarded to OCCD for review. Military discharge verification and education verification hiring requirements were added to the Guard Applicant Checklist (hiring requirements form).

- See updated Allied Universal Guard Applicant Checklist (hiring requirements form) updated April 2024 – Attachment A.



Wendy Kittleson, Comptroller’s Office  
Response to Audit of OCCD Security Guard Services  
June 17, 2024

2

**B) Review the hiring requirement forms to confirm all hiring requirements are completed before guards report for duty;**

**Response: Concur.**

As of April 2024, the approval stamp with date and Sr. Monitoring & Evaluation Coordinator’s (OCCD Contract Monitor) signature were added to the New Guard Applicant Checklist process to ensure that the final compliance items are reviewed and included in the applicant’s file prior to OCCD moving forward with the approval process. The checklist is signed by Allied Universal Management ensuring the supporting documentation is attached. The OCCD Contract Monitor is required to file documents in a locked cabinet behind a locked file closet.

- *This will assist the OCCD Contract Monitor with the file compliance review and ensure accountability for the contractor. Attachment B.*

**C) Confirm newly hired guards complete the required trainings before working at Corrections;**

**Response: Concur. Going into the Smartsheet to review that dates are included in review.**

OCCD updated the onboarding process to include the verification of the listed critical trainings. The Smartsheet will contain completion dates of the required training prior to Security Officers gaining access to the Juvenile Assessment Center, effective immediately.

1. Child Abuse Recognition, Reporting, and Prevention
2. CPR/First Aid/Automatic Electronic Defibrillator (AED)
3. Emergency Procedures
4. Facility / Program Operating Procedures
5. Prison Rape Elimination Act (PREA)
6. Professionalism, Interpersonal Communication, and Ethics to include Standards of Conduct
7. Right Interactions
8. Suicide Awareness and Prevention
9. FCIC/NCIC Certification (Orange County will provide)

Allied Universal is responsible for having all required training documents upon request that were not previously provided during the hiring requirement process. Allied Universal uses an online software program called Smartsheet to track training dates and store records. OCCD provided the list of required training to Allied Universal that were added to the Smartsheet system. The Smartsheet system is reliant on manual input of training dates and storage of training documents in numbered files as proof of training. Allied Universal is set to implement a tracking and management software program to fully automate and provide notification to management regarding training due dates. The random file review checklist process was modified based on the Comptroller’s Office suggestions.



Wendy Kittleson, Comptroller’s Office  
Response to Audit of OCCD Security Guard Services  
June 17, 2024

3

- *The contractor will be issued an unsatisfactory notice for noncompliance if the required onboarding training is not properly documented and completed during the file review process. See Attachment C*

**D) Develop procedures to ensure that required refresher training is timely completed; and,**

**Response: Concur.**

Allied Universal is responsible for having required training documents upon request that were not previously provided during the hiring requirement process. OCCD will verify random refreshers and renewal training during the random file review by verifying that the Smartsheet has updated completion dates.

- *The contractor can be issued an unsatisfactory notice for noncompliance if training documentation is not updated.*

**E) Retain documentation of completed hiring requirements forms and training.**

**Response: Concur.**

OCCD retains initial hiring documents and maintains access to the Smartsheet system to view and print documents as needed. Allied Universal is responsible for having all required training documents upon request that were not previously provided during the hiring requirement process. These records are stored and maintained by the Contractor. Random file reviews will be conducted.

- *The contractor can be issued an unsatisfactory notice for noncompliance if training documentation is not updated.*

Additionally, to fully comply with State standards for juvenile detention direct care staff, Allied Universal will use the Florida Department of Juvenile Justice authorized online Skillpro training program as the primary training tool for Juvenile Assessment Center (JAC) Officer training. Skillpro records are maintained and accessible and is the primary training designed to meet the Florida Administrative Code (63H) and Department of Juvenile Justice standards. Orange County is in the process of amending the current contract to meet 63H standards.

**Recommendation No. 2**

**Corrections should:**

- A) Review the current staffing requirements, including the need for both armed and unarmed guards, and ensure that any current or future changes to the Contract are appropriately approved and communicated;**

**Response: Concur.**

Corrections is amending the current contract to reflect training, staffing and radiation monitoring changes. These items will be included on the new Request for Proposal (RFP) as well.



Wendy Kittleson, Comptroller’s Office  
Response to Audit of OCCD Security Guard Services  
June 17, 2024

4

Allied Universal provides OCCD with a memo with invoices detailing shift shortages and changes. Based on the audit, no post was completely unguarded.

**B) Ensure that Allied staffs at least one female guard at the JAC at all times; and**

**Response: Concur.**

Operational changes have occurred to ensure that Corrections is notified immediately in the event a female staff is not available for shift. The contractor is required to submit an after-shift report containing the names of all staff who worked the shift. Additional female staff was hired by Allied Universal to meet this requirement.

- *An unsatisfactory notice will be issued if the contractor continues to not meet this requirement. This is being monitored by OCCD Support Operations Division and OCCD Contract Monitor.*

**C) Confirm that all guards assigned to an armed post hold an active class-G firearms license prior to assignment.**

**Response: Concur.**

All licenses are required to be noted in the hiring package submitted to OCCD, which is included on the New Guard Applicant Checklist. The approval stamp with date and OCCD Contract Monitor’s signature were added to the Guard Applicant Checklist process to ensure that the final compliance items are reviewed and included in the applicant’s file prior to OCCD moving forward with the approval process.

**Recommendation No. 3**

**Corrections should:**

**A) Evaluate the current Performance Monitoring Plan to ensure it adequately evaluates Allied’s Contract compliance. This should include quarterly screener testing;**

**Response: Concur.**

An official Performance Monitoring Plan was never developed. However, OCCD Contract Monitor completes the following key tasks below. In the event several problematic concerns are discovered, the OCCD Contract Monitor notifies the chain of command and requests a written corrective action plan.

1. Annual compliance review – OCCD has increased the compliance file review to twice a year. OCCD Contract Monitor communicates and documents the file review information via emails and through memorandum to the contractor. The OCCD Contract Monitor randomly checks files on an ongoing basis but completes the formal file review twice per year. The review processes are being streamlined and automated to ensure that employee files remain compliant. OCCD





Wendy Kittleson, Comptroller’s Office  
Response to Audit of OCCD Security Guard Services  
June 17, 2024

5

implemented some of the Comptroller’ Office recommendations to the file review form.

2. Ad-hoc screener observations – OCCD Support Operations is responsible for monitoring daily operations such as quarterly screening and other functions. The OCCD Contract Monitor may occasionally review those areas and consult with OCCD Support Operations regarding any concerns during the quarterly surveys. Written procedures are being developed by Support Operations to complete the ad-hoc screener observations.
3. Quarterly surveys – OCCD Support Operations and OCCD Contract Monitor provide feedback on compliance and services provided during quarter. Only one quarterly survey was missed during the audit period.

**B) Prepare written documentation of the Performance Monitoring Plan including key areas for review, procedures to be performed, timing, documenting and communicating results, and required corrective actions; and,**

**Response: Concur.**

Quarterly surveys are sent out by 15<sup>th</sup> and completed by the 30<sup>th</sup> on the following schedule. Surveys are filed electronically in Corrections Fiscal Division S: drive survey folders.

- October – December: 1<sup>st</sup> QTR due by January 30
- January – March: 2<sup>nd</sup> QTR due by April 30
- April – June: 3<sup>rd</sup> QTR due by July 30
- July – September: 4<sup>th</sup> QTR due by October 30

The OCCD Contract Monitor communicates and documents the file review information via emails and through memorandum to the contractor. The file review is conducted twice a year during December – January and July – August.

**C) Ensure completed review documentation is maintained;**

**Response: Concur.**

Completed review documentation is maintained by OCCD Fiscal/Contracts. OCCD Contract Monitor is required to file documents electronically in Corrections Fiscal Division S: drive folders.

**Recommendation No. 4**

**Corrections should work with County Administration to amend the Contract to ensure it aligns with current operations.**

**Response: Concur.**

OCCD is currently completing further amendments to the contract to reflect updated requirements. In addition, OCCD Contract Monitor and one Correctional Officer



*Wendy Kittleson, Comptroller’s Office*  
*Response to Audit of OCCD Security Guard Services*  
*June 17, 2024*

6

meets periodically with the Orange County Security Guard Committee to discuss challenges and best practices related to all county security guard contracts.

**Recommendation No. 5**

**Corrections should implement a process to confirm that Allied complies with Contract requirements for monitoring radiation levels.**

**Response: Concur.**


This monitoring radiation levels dosimeter requirement will be removed in the new RFP contract. As of February 2023, all radiation level inspections were coordinated by the contractor in accordance with industry standards. The dosimeters have been read by an outside testing firm. OCCD will confirm that the dosimeter evaluations have been completed by the contractor during quarterly survey reporting.



Wendy Kittleson, Comptroller’s Office  
 Response to Audit of OCCD Security Guard Services  
 June 17, 2024

7

**Attachment A – OCCD Guard Applicant Checklist (page 1)**



### Guard Applicant Checklist

Applicant Name: \_\_\_\_\_

Age Verified (19 yrs. +)	Yes <input type="checkbox"/>	No <input type="checkbox"/>
DOB		
Gender/Race		
Military	Yes <input type="checkbox"/>	No <input type="checkbox"/>
FDLE Check	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Driver’s License Number		
Social Security #		
Work History Verified (7yrs)	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Credit Check	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Psychological Exam (MMPI)	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Education Verified	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Multi-jurisdictional Criminal/Sex Offender Registry Search	Yes <input type="checkbox"/>	No <input type="checkbox"/>
US Citizen or Necessary Authorization from the INS	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Minimum nine (9) Panel Drug Screen	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Personal References	Yes <input type="checkbox"/>	No <input type="checkbox"/>
D License Verified	Yes <input type="checkbox"/>	No <input type="checkbox"/>
G License Verified	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Physical Completed	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Phone Number		
Form 63	Yes <input type="checkbox"/>	No <input type="checkbox"/>
State, County		
Global Enhanced Nationwide Security Check	Yes <input type="checkbox"/>	No <input type="checkbox"/>



Wendy Kittleson, Comptroller’s Office  
 Response to Audit of OCCD Security Guard Services  
 June 17, 2024

8

**Attachment A – OCCD Guard Applicant Checklist (page 2-3)**

Contractor hereby certifies that he/she has reviewed the security guard applicant, and that the applicant has met the requirements of Y17-152, Armed and Unarmed Security Guard Services, as amended.

Contractor/Subcontractor: \_\_\_\_\_  
 Name and Title (printed): \_\_\_\_\_  
 Signature: \_\_\_\_\_

Page 2

This portion is to be turned in separately from Page 1, when the training has been authorized and completed.

CJIS Certificate	Yes <input type="checkbox"/>	No <input type="checkbox"/>
X-Ray Interpretation Certificate	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Security Addendum	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Contractor hereby certifies that he/she has reviewed the security guard applicant and that the applicant has met the requirements of Y17-192, Armed and Unarmed Security Guard Services, as amended.

Contractor/Subcontractor: \_\_\_\_\_  
 Name and Title (printed): \_\_\_\_\_  
 Signature: \_\_\_\_\_

Rev. Date: March 28, 2024



Wendy Kittleson, Comptroller’s Office  
 Response to Audit of OCCD Security Guard Services  
 June 17, 2024

9

Attachment B

**Corrections Fiscal Services & Operational Support Division**  
**Vendor Employees and Volunteers On-Boarding Process Checklist**

Prior to final clearing to access the Orange County Corrections Department’s facilities, Vendor Employees and Volunteers must have the following forms and tasks completed:

Printed Name: Elizabeth Caban Vendor / Organization: Allied Universal

<p><input checked="" type="checkbox"/> <b>PREA Survey Completed</b>                  Responsible Division: Fiscal Div.                  Approved by (Print Name): <u>[Signature]</u>                  Approved by Signature: <u>[Signature]</u>                  Date: <u>5/8/24</u></p> <p><input checked="" type="checkbox"/> <b>Background Check Completed</b>                  Responsible Division: Internal Affairs Div.                  Approved by (Print Name): <u>Markeda Clayton I.A.</u>                  Approved by Signature: <u>[Signature]</u>                  Date: <u>5/1/24</u></p> <p><input checked="" type="checkbox"/> <b>CJIS Online Training Completed</b>                  Responsible Division: Training/Development Div.                  Approved by (Print Name): <u>[Signature] / 5/6/24</u>                  Approved by Signature: <u>KENYA COV PROVIDES</u>                  Date: <u>5/8/24</u></p> <p><input checked="" type="checkbox"/> <b>Security Block (4-Hour) with the PREA Requirement Completed</b>                  Responsible Division: Training/Development Div.                  Approved by (Print Name): <u>Lee Isabel</u>                  Approved by Signature: <u>[Signature]</u>                  Date: <u>MAY 8, 24</u>  <u>CIAS 5</u></p>	<p><input checked="" type="checkbox"/> <b>Security Addendum Form Completed</b>                  Responsible Division: Training/Development Div.                  Approved by (Print Name): <u>[Signature]</u>                  Approved by Signature: <u>[Signature]</u>                  Date: <u>5/8/24</u></p> <p><input checked="" type="checkbox"/> <b>Fingerprints Submitted</b>                  Responsible Division: Human Resources Dept.                  Approved by (Print Name): <u>[Signature]</u>                  Approved by Signature: <u>[Signature]</u>                  Date: <u>MAY 6, 24</u></p> <p><input checked="" type="checkbox"/> <b>Badge Issued</b>                  Responsible Division: Human Resources Dept.                  Approved by (Print Name): <u>[Signature]</u>                  Approved by Signature: <u>[Signature]</u>                  Date: <u>5/15/24</u></p> <p style="text-align: center;"><u>X-RAY Interpretation</u>  <u>5/8/24</u></p> <p style="text-align: center;"><b>APPROVED</b>  <u>[Signature]</u> DATE: <u>5/15/24</u></p>
---	---



Wendy Kittleson, Comptroller's Office  
Response to Audit of OCCD Security Guard Services  
June 17, 2024

10

**Attachment C – AUS File Audit 02.09.2024 (page 1)**



**Interoffice Memorandum**

Memo To: Jonathan Cabrera, Director of Operations  
Allied Universal Security

From: Lee Isbell, Sr. Contract Monitor *Lee Isbell*  
Orange County Corrections Department

Date: February 8, 2024

Subject: Allied Universal Security (AUS)  
Employee Training and Onboarding File Audit Results

The annual file audit of essential items related to contractual requirements began November 29, 2023, and was completed January 29, 2024. The audit results are attached for your review and signature. Overall documentation has improved from previous audits in each of the randomly selected files.

Aside from the results of the review (attached), I have additional comments to provide relative to the audit in general. The amount of time to conduct the audit was increased, in part, due to Allied Universal Security (AUS) failing to provide some of the essential required documentation in the shared Smartsheet file. Due to the deficiencies I began to spot check additional files because of my concerns. What should have been a quick and routine audit became much more than anticipated. AUS was able to retrieve the necessary documentation but only with delays and additional questions. Prior to this audit, AUS managers and site managers were provided many opportunities and notices for preparation via email as well as verbal communication at weekly meetings. The Juvenile Assessment Center (JAC) files were disorganized and lacked key documentation. The request resulted in a "scrambling" effect where management at various levels had to "find" critical information. Fortunately, the file audit is now complete and satisfactory, but the essential element of preparation is unacceptable.

As you are aware, the Orange County Comptroller Audit as well as documentation from previous audits conducted by the Orange County Sr. Monitoring and Evaluation Coordinator have pointed to several deficiencies and an overall lack of consistency in maintaining critical information. Due to the issues encountered during this audit I requested a corrective action memo outlining a compliance initiative from AUS. You provided the memo (attached) in which AUS pledged to implement quality control audits to ensure full compliance. Please ensure that you provide all records of future file audits to my office for tracking and follow-up purposes. Your continuous commitment to quality control is essential to this contract and our continued partnership.

Attachments:

cc: Louis A. Quinones, Chief of Corrections  
E Keith Neely, Deputy Chief, Security  
Anthony D. Watts, Sr., Deputy Chief, Administration  
Andrea Jones Lowery, Manager, Corrections Fiscal  
File



Wendy Kittleson, Comptroller’s Office  
 Response to Audit of OCCD Security Guard Services  
 June 17, 2024

11

**Attachment C – AUS File Audit 02.09.2024 (page 2)**

**ANNUAL Security Contract Audit File Compliance List Review**

Annual Review Date: 11/29/23 to 1/22/24

Contract # Y17-192 Allied Universal Security (AUS)

Randomly select AT LEAST 3 employees from the Compliance List based on the areas stated (JAC, OCCD, Sub-Contractor and New Hires). Randomly select AT LEAST 6 core compliances to validate information for each employee is available and updated. If information is correct/available, place a Y or YES in box and N or NO if not. Note any major concerns that need to be address with vendor in final review memo. This File Compliance Review can be conducted at any time when needed.

	JAC Location			Corrections Facility			
	EMPLOYEE NAME	Natasha Lewin	Juan Camacho	Stephen Andreau	Layla Ressler	Micahyu Petrus Bryan	Stephanie Jones
1	Date Hired	4/20/2023	10/25/2021	10/26/2021	7/8/2019	4/26/2023	10/19/2000
2	E-Verify Completed [Employment Authorized]	yes	yes	yes	yes	yes	yes
3	Background Completed	yes	yes	yes	yes	yes	yes
4	Driver's License Check	yes	yes	yes	yes	No Drivers license	yes
5	FDLE Check	yes	yes	yes	yes	yes	yes
6	Social Security Check	yes	yes	yes	yes	yes	yes
7	Multi-Juris Criminal/ Sex Offender Registry Check	yes	yes	yes	yes	yes	yes
8	Credit Check	yes	yes	yes	yes	yes	yes
9	Employment History Check	yes	yes	yes	yes	yes	yes
10	Reference Check	yes	yes	yes	yes	yes	yes
11	Minimum 9 Panel Drug Screen	yes	yes	yes	yes	yes	yes
12	Physical Completed by Centra Care	yes	yes	yes	yes	yes	yes
13	Psychological Examination 370 Question	yes	yes	yes	yes	yes	yes
14	CJIS Online Training	yes	yes	yes	yes	yes	yes
15	DC Criminal Background	yes	yes	yes	yes	yes	yes
16	CPR, First Aid & AED Expiration	yes	yes	yes	yes	yes	yes
17	G License Expiration	NA	NA	NA	NA	NA	NA
18	D License Expiration	2/27/2025	12/21/2025	11/30/2025	7/22/2025	5/3/2025	10/27/2025
19	Suicide Awareness	yes	yes	yes	yes	yes	yes
20	Security Addendum	yes	yes	yes	yes	yes	yes
21	40m Hour Screener Training/Perimeter officers	NA	NA	NA	yes	yes	yes
22	Protection of Facility Training	yes	yes	yes	yes	yes	yes
23	Handling Special Situation Training	yes	yes	yes	yes	yes	yes

1 of 2 JAC & OCCD / created: 06/2022



Wendy Kittleson, Comptroller’s Office  
 Response to Audit of OCCD Security Guard Services  
 June 17, 2024

12

**Attachment C – AUS File Audit 02.09.2024 (page 3)**

**ANNUAL Security Contract Audit File Compliance List Review**

Contract # Y17-192 Allied Universal Security (AUS) Annual Review Date: 11/29/23 to 1/22/24  
 Randomly select AT LEAST 3 employees from the Compliance List based on the areas stated (JAC, OCCD, Sub-Contractor and New Hires). Randomly select AT LEAST 6 core compliances to validate information for each employee is available and updated. If information is correct/available, place a **Y** or **YES** in box and **N** or **NO** if not. Note any major concerns that need to be address with vendor in final review memo. This File Compliance Review can be conducted at any time when needed.

EMPLOYEE NAME	JAC Location			Corrections Facility		
	Natasha Lewin	Juan Camacho	Stephen Andreau	Layla Ressler	Micahyu Petrus Bryan	Stephanie Jones
PAR Training Initial and Annual refresher/JAC	yes	yes	yes	NA	NA	NA
24 Officers						
25 PREA Questionnaire	yes	yes	yes	yes	yes	yes
26 Block Training	yes	yes	yes	yes	yes	yes
27 Education verification	yes	yes	yes	yes	yes	yes
28 FCIC/NCIC JAC location	yes	yes	yes	NA	NA	NA

Auditor Signature:

Auditor Name: Lee Isbell

Vendor Signature:

Vendor Name: Allied Universal Security

COMMENTS: This audit was particularly difficult to complete due to several missing documents resulting in multiple emails and contact with Allied to find documents. Allied Universal Security (AUS) was provided the opportunity to provide a memorandum to memorialize their commitment to maintaining the files in accordance with the standards expected and agreed upon.





Wendy Kittleson, Comptroller’s Office  
 Response to Audit of OCCD Security Guard Services  
 June 17, 2024

13

**Attachment C – AUS File Audit 02.09.2024 (page 4)**

**ANNUAL Security Contract Audit File Compliance List Review**

Contract # Y17-192 Allied Universal Security (AUS) Annual Review D 11/29/23 to 1/22/24  
 Randomly select AT LEAST 7-8 employees from the Compliance List based on the areas stated (IAC, OCCD, Sub-Contractor and New Hires). Randomly select AT LEAST 5 core compliances to validate information for each employee is available and updated. If information is correct/available, place a **Y** or **YES** in box and **N** or **NO** if not. Note any major concerns that need to be addressed with vendor in final review memo. This File Compliance Review can be conducted at any time when needed.

		SUB-CONTRACTOR		
EMPLOYEE NAME	Grace Gordon	Sirena Bryan	N/A	
1	Date Hired	4/26/2021	9/2/2022	
2	E-Verify Completed (Employment Authorized)	yes	yes	
3	Background Completed	yes	yes	
4	Driver's License Check	yes	yes	
5	FDLE Check	yes	yes	
6	Social Security Check	yes	yes	
7	Multi-Juris Criminal/ Sex Offender Registry Check	yes	yes	
8	Credit Check	yes	yes	
9	Employment History Check	yes	yes	
10	Reference Check	yes	yes	
11	Minimum 9 Panel Drug Screen	yes	yes	
12	Physical Completed by Centra Care	yes	yes	
13	Psychological Examination	yes	yes	
14	CJIS Online Training	yes	yes	
15	OC Criminal Background	yes	yes	
16	CPR, First Aid & AED Expiration	yes	yes	
17	G License Expiration	NA	NA	
18	D License Expiration	2/6/2025	9/29/2024	
19	Suicide Awareness	yes	yes	
20	Security Addendum	yes	yes	
21	40 Hour Screener Training	yes	yes	
22	Protection of Facility Training	yes	yes	
23	Handling Special Situation Training	yes	yes	
24	PAR Training and Par Refresher Training	NA	NA	
25	PREA Questionnaire	yes	yes	
26	Block Training	yes	yes	
27	Education Verification	yes	yes	
28	FCIC/NCIC JAC location	NA	NA	

Auditor Signature: 

See first page.

Auditor Name: L. Isbell

Vendor Signature: 

Vendor Name: Allied Universal Security



Wendy Kittleson, Comptroller’s Office  
Response to Audit of OCCD Security Guard Services  
June 17, 2024

14

**Attachment C – AUS File Audit 02.09.2024 (page 5)**



To: Lee Isbell  
From: Jonathan Cabrera – Director of Opretations  
Date: 1/11/23  
Subject: JAC Auditing Action Plan

Lee,

Thank you for providing us with your valuable feedback on the recent audit conducted at OC JAC. We acknowledge the considerable time and opportunity you granted us for self-auditing. Despite this, we regret to inform you that we fell short in maintaining current records, particularly those that should have been filed within our employee records.

In response to this, we have implemented a proactive measure to prevent such occurrences in the future. We have established a monthly calendar invite to conduct internal reviews and audits of our records. This process involves randomly selecting files from 5 to 10 employees on our smart sheet and ensuring that all files are consistently up to date. Following each self-audit, we commit to providing you with a comprehensive email update on our findings, irrespective of whether they are positive or highlight areas for improvement.

We believe that this systematic approach will eliminate any gaps in our files moving forward, ensuring a smoother and more efficient audit process in the future.

Thank you for your understanding and continued support.



If there are any questions you can reach Director of Operations Jonathan Cabrera at

407-994-6489

2301 Maitland Center  
Parkway | Suite 130 |  
Maitland, FL 32751  
[www.allieduniversal.com](http://www.allieduniversal.com)



April 29, 2024

Phil Diamond, CPA  
Orange County Comptroller  
201 S. Rosalind Avenue  
Orlando, FL 32801  
E-mail: [phil.diamond@occompt.com](mailto:phil.diamond@occompt.com)

RE: Draft Audit of Orange County Corrections Security Guard Services

Dear Mr. Diamond,

Universal Protection Service, LLC dba Allied Universal Security Services (“Allied Universal”) appreciates the opportunity to provide comments to the Draft Audit of Orange County Corrections Security Guard Services. Allied Universal’s comments to several of the Recommendations for Improvement stated in the Draft Audit are attached.

Very truly yours,

Robert C. Wood  
President, Florida Region



**RESPONSES TO RECOMMENDATIONS FOR IMPROVEMENT**

**SUBMITTED BY: UNIVERSAL PROTECTION SERVICE, LLC DBA  
ALLIED UNIVERSAL SECURITY SERVICES (“ALLIED UNIVERSAL”)**

**Recommendation No. 1:**

Corrections should:

- A) Ensure the hiring requirements form includes all hiring requirements according to the Contract;
- B) Review the hiring requirements forms to confirm all hiring requirements are completed before guards report for duty;
- C) Review training documentation to confirm newly hired guards complete the required trainings before working at Corrections;
- D) Develop procedures to ensure that all required refresher training is timely completed; and,
- E) Retain documentation of completed hiring requirements forms and trainings

**Allied Universal’s response:**

Allied Universal concurs with the recommendations and can confirm that the following measures to effectuate the recommendations have already been implemented or are currently in the process of implementation:

**Recommendation 1.A**

In April, 2023, the Hiring Requirements Form was updated by Allied Universal to include references to: (1) military discharge verification; and (2) education verification. Those items are specified in Orange County Contract # Y17-192, but were not included on the Hiring Requirements Form that was in use prior to April 2023.

**Recommendation 1.B**

Prior to June 2023, the County routinely waived the submission of complete hiring packets because fingerprinting and certain required trainings, which should be done after completion of all hiring requirements, were administered by the County very infrequently. Thus, during that time, the County was willing to accept incomplete hiring packets, with outstanding requirements noted as “pending” on the Hiring Requirements Form, in order to allow new hires to take advantage of opportunities to complete fingerprinting and training requirements in a timely manner. In May 2022 the County and Allied Universal adopted an additional safeguard to ensure that no officer is assigned to a County post without having satisfied all of the requirements denoted by the Hiring Requirements Form. Since May 2022, the County and Allied Universal have met on a weekly basis to conduct a manual review of the pre-hire packets of all new hires deemed eligible for assignment to confirm the presence of all required pre-hire documentation.



In June 2023, when fingerprinting and County administered training became more readily available, the County informed Allied Universal that a complete pre-hire packet is needed before a new hire may undergo fingerprinting and County administered training. However, the County and Allied Universal have nonetheless continued the weekly pre-hire packet review meetings referred to above

**Recommendation 1.C**

Much of the pre-assignment training required of officers assigned to work at the Corrections Department is administered by the County, and Allied Universal has no visibility into the status of County administered training. Therefore, in March 2023, the County and Allied Universal devised a process whereby the County sends Allied Universal documentary evidence of completion of all County administered training for storage by Allied Universal in a Smartsheet database created for that purpose. Allied Universal Supervisors are instructed to request training documentation from the County on a regular basis and to escalate any non-responsiveness to Allied Universal’s General Manager for resolution with the County. The Smartsheet database is audited for completeness on a monthly basis by Allied Universal’s Regional Trainer and Client Manager.

In March 2023, Allied Universal also loaded all of our historical pre-assignment training records into the Smartsheet database for analysis. Where there was no record of an incumbent officer having satisfied a particular pre-assignment training requirement, the officer was required to repeat that training course.

Prior to first assignment, each Corrections Department officer is required to perform 40 hours of on-the-job training (“OJT”) within the Corrections work environment to help the officer develop the necessary skills and abilities to perform the job. OJT is administered by Allied Universal. In March 2023, Allied Universal launched a new OJT training curriculum, inclusive of template forms required to be completed by Allied Universal Supervisors to evidence completion of each OJT training module. Those forms are logged into the same Smartsheet database referenced above and are also subject to the same periodic audits described above.

**Recommendation 1.D**

Allied Universal is now using the same Smartsheet database referenced above to: (1) monitor refresher training renewal dates; (2) track completion of refresher training; and (3) store documentary evidence of completion of refresher training. Allied Universal Supervisors are required to collect and log evidence of all refresher training in the form issued for each training course, which may include: (a) a certificate of completion (e.g. FCIC/NCIC); (b) training transcript maintained by the Skill Pro State Learning Management System for the Department of Juvenile Justice (e.g. PAR); or (c) copies of new certifications (e.g. CPR/ First Aid/ AED). Where refresher training is administered by the County, Allied Universal Supervisors must request evidence of completion from the County; non-response by the County must be escalated to the Allied Universal General Manager for resolution with the County, as described in Allied Universal’s response to Recommendation 1.C. Refresher training records are audited monthly by Allied Universal’s Regional Trainer and Client Manager to confirm completeness.

Orange County Contract # Y17-192 requires officers assigned to the Juvenile Assessment Center (“JAC”) to take some, but not all, of the courses comprising the curriculum promulgated by the Florida Department of Juvenile Justice as part of the Skill Pro State Learning Management System. Although not



a contract requirement, Allied Universal will soon begin tracking the initial and all refresher completions by JAC officers of all of the courses in the Skill Pro State Learning Management System.

**Recommendation 1.E**

Document retention processes are outlined in Allied Universal’s responses to Recommendation 1.C and Recommendation 1.D. We would also like to clarify that the Hiring Requirements Form is not specified in Orange County Contract # Y17-192 as one of Allied Universal’s contract deliverables, and Allied Universal has no contractual obligation to maintain copies of that form. The form is used solely as a cover sheet which denotes the presence or absence of certain records in the hiring packet submitted to the County for each new hire.

**Recommendation No. 2:**

Corrections should:

- A) Review the current staffing requirements, including the need for both armed and unarmed guards, and ensure that any current or future changes to the Contract are appropriately approved and communicated;
- B) Ensure that Allied staffs at least one female guard at the JAC at all times; and
- C) Confirm that all guards assigned to an armed post hold an active class-G firearms license prior to assignment.

**Allied Universal’s Response:**

Allied Universal concurs with the recommendations and can confirm that the following measures to effectuate the recommendations have already been implemented or are currently in the process of implementation:

**Recommendation 2.A**

There have been ongoing discrepancies between the scheduled hours that are specified for the Corrections Department in Orange County Contract # Y17-192 and the Corrections Department hours actually requested by the County since Allied Universal began operating the contract in October 2021. With every invoice submitted since October 2021, Allied Universal has enclosed a letter comparing the Corrections Department hours actually requested by the County against the contract requirements. The schedule of Corrections Department hours stated in the contract has never been amended to reflect the County’s actual requirements.

**Recommendation 2.B**

Allied Universal appreciates the importance of ensuring that at least one female officer is on duty at the JAC at all times. Consequently, Allied Universal undertook a concerted effort to hire additional female officers for the JAC. Currently, approximately 50% of the officers assigned to the JAC are female. Allied Universal’s Client Manager reviews each weekly schedule for the JAC to confirm that at least one female officer per shift is scheduled. Allied Universal is also in the process of cross training female officers assigned to the Corrections Department for duty at the JAC so that unanticipated vacancies can be quickly filled.



**Recommendation 2.C**

Allied Universal’s scheduling software is programmed to identify all armed posts, as well as monitor the class-G firearms license expiration dates of officers selected to fill armed posts throughout the State of Florida. An Allied Universal scheduler will receive an alert if an officer whose class-G firearms license is about to expire is selected to fill an armed post. Additional non-compliance alerts are provided by Allied Universal’s business intelligence software which tracks firearms license expiration dates on a nationwide basis.

Due to staffing shortfalls, there were times when an armed officer was not available to fill an armed post. In such a case, it is Allied Universal’s practice to send written notice to the County, so that the County may fill the post with an armed police officer and back charge Allied Universal for the cost of the armed police officer’s time. Allied Universal is in the process of hiring additional armed officers to alleviate further staffing shortfalls.

**Recommendation No. 5:**

Corrections should implement a process to confirm that Allied complies with Contract requirements for monitoring radiation levels.

**Allied Universal’s response:**

Allied Universal concurs with the recommendation and can confirm that the following measures to effectuate the recommendation have already been implemented:

Since April 2022, Allied Universal has ensured that every x-ray screener is issued a dosimeter. Since February 2023, supervisors have ensured that every x-ray screener wears his/her dosimeter while on duty. All dosimeters have been read monthly by an outside testing firm since April 2022. No dosimeter reading has ever substantiated any exposure to radiation. This outcome aligns with our understanding that all County x-ray machines receive annual State Radiation Certificates, which confirm no radiation leaks.