



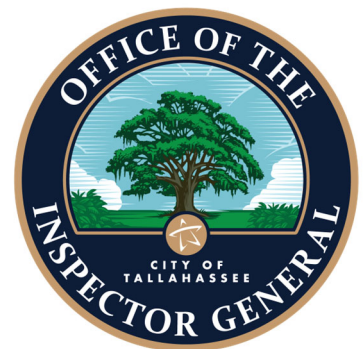
Audit of Requests for Public Records

Report AR-2504
June 30, 2025

City of Tallahassee

Office of the Inspector General

Dennis R. Sutton, Inspector General, CPA, CIA, CIG





Audit of Requests for Public Records

Why We Did This Audit

This audit was conducted to evaluate whether requests for public records are fulfilled accurately, timely, and in accordance with Chapter 119, Florida Statutes (F.S.), City policies and procedures, and best practices. The audit's objectives were to:

- 1) Evaluate the City's policies and procedures related to requests for public records to determine if they promote compliance with Chapter 119, F.S., and incorporate best practices.
- 2) Determine if the City fulfilled requests for public records in accordance with Chapter 119, F.S., City policies and procedures, and best practices.

What We Did

To accomplish the audit objectives identified above, we:

- developed an understanding of, and evaluated, the policies and procedures related to requests for public records, including:
 - City Commission Policy 140 – *Public Records, Record Retention, & Disposition Policy*
 - Administrative Policy and Procedure 206 – *City of Tallahassee Policy on Public Records Request Procedures*
 - Administrative Policy and Procedure 706 – *Personnel Policies and Procedures Manual*
- tested the City's responses to 25 randomly selected and 25 judgmentally selected requests for public records from the 767 requests for public records received by the Records Division of the Office of the Treasurer-Clerk in 2022,
- tested the City's responses to nine requests for public records sent by our office using pseudonyms in 2023, and
- interviewed three Records Division employees and six City employees designated to assist the Treasurer-Clerk in fulfilling requests for public records within their respective departments (department representatives).

What We Determined

Based on our audit, we determined the City's policies and procedures related to requests for public records promote compliance with Chapter 119, F.S., and incorporate best practices. However, we did identify opportunities to enhance the policies and procedures and associated internal controls (e.g., training). We also found that the City fulfilled requests for public records consistently in accordance with Chapter 119, F.S., for some requirements (i.e., timely acknowledgment and fulfillment) but were less consistent for other requirements (i.e.,



redacting exempt and confidential information and providing the statutory basis for redactions).

Based on our audit procedures, we found:

- Policies and procedures contained inconsistent information.
- Instances where responses to requests for public records contained:
 - o Exempt and confidential information.
 - o Redacted information without a stated basis for the exemption asserted.
- City employees who were designated to assist the Treasurer-Clerk in fulfilling requests for public records within their respective departments (i.e., department representatives) had not received formal training and, consequently, did not always have sufficient knowledge of the relevant public records requirements and City policies and procedures.



Background

State Laws

Article 1, Section 24 of the Florida Constitution affords a constitutional guarantee to the openness of public records. Florida's Public Records Law, Chapter 119, Florida Statutes (F.S.), provides that any records made or received by any public agency in the course of its official business are available for inspection unless specifically exempted.

Although Chapter 119, F.S., does not explicitly define or differentiate the terms records or information, for clarity, we will use the term "record" to refer to a document, e-mail, report, meeting minutes, etc. in its entirety and the term "information" to refer to specific content within a record (e.g., a social security number). Examples of information exempted under Chapter 119, F.S., include the:

- social security numbers of all current and former agency employees which are held by the employing agency (Section 119.071(4)(a)1, F.S.),
- home addresses, telephone numbers, dates of birth, and photographs of current or former personnel employed in a position for which such information is exempt from disclosure (Section 119.071(4)(d)2.r, F.S.),
- information that would identify or locate a child who participates in a government-sponsored recreation program (Section 119.071(5)(c)2, F.S.), and
- information that would identify or locate a parent or guardian of a child who participates in a government-sponsored recreation program (Section 119.071(5)(c)3, F.S.).

Section 119.07(1), F.S., stipulates that when a custodian of public records asserts that an exemption applies to a portion of a public record (i.e., specific information):

- the exempt portion shall be concealed from public viewing (i.e., redacted) and the remainder of such record be provided for public inspection and copying, and
- the custodian is required to state the basis of the exemption they contend is applicable to the record, including the statutory citation for exemptions created or afforded by statute.

City Commission Policy 140 - Public Records, Record Retention, & Disposition Policy

The City created City Commission Policy 140 (CP 140) "to ensure that the public records of the City of Tallahassee are efficiently retained and disposed in a manner consistent with Florida Statutes, Florida Administrative Code, the Florida Public Records Act, and the City Charter." CP 140 identifies the City Treasurer-Clerk as the custodian of general, non-law enforcement records and the central coordinator of all requests pertaining to those records. Additionally, CP 140 provides:

- Public records requests may be submitted to City departments, but for the most expeditious processing, requests should be directed to the City Treasurer-Clerk for general/non-law enforcement records and to the Chief of Police for law enforcement/traffic crash reports and records.
- The Treasurer-Clerk shall serve as centralized coordinator of all requests for City records except that the Chief of Police and Fire Chief shall serve in that role for requests pertaining to law enforcement and arson investigations, respectively.
- The Treasurer-Clerk is authorized to periodically update CP 140 in response to legislative changes to the Public Records Act (Chapter 119, F.S.), other exemptions created or abolished by the legislature, or to incorporate new case law. When a ministerial revision is planned, the City Commission is to be notified and such revision shall become effective 10 days thereafter, notwithstanding the objection of any Commissioner.
- The Treasurer-Clerk will not assess fees for reproduction costs where the number of printouts is less than 100 pages and will not levy a special service charge when the staff time to respond does not exceed two hours, in aggregate, on a single request.

Notwithstanding any administrative updates, CP 140 mandates the Treasurer-Clerk schedule the policy for a sunset review by the City Commission every five years.

Administrative Policy and Procedure 206 - City of Tallahassee Policy on Public Records Request Procedures

Administrative Policy and Procedure 206 (APP 206) requires each City department to designate a primary and secondary representative (i.e., department representatives) to assist the Treasurer-Clerk in fulfilling requests for public records within their respective departments.

Observation 1

Review of City Commission Policy 140

Based on our review of CP 140, we found it generally promoted compliance with Chapter 119, F.S., and incorporated best practices; however, we identified certain aspects of the policy that should be revised. Specifically, we noted:

- Section B of the policy that addresses the Treasurer-Clerk’s role as records custodian should be expanded to explicitly define the responsibility and authority of the records custodian, and
- Section I.02 of the policy which gives the Treasurer-Clerk authority to make certain changes to CP 140 without City Commission direction should be revised.

Custodian of Records (Section B)

Section B of Commission Policy 140 is titled “Custodian of Records” and identifies where to properly request public records and where to file grievances regarding requests for public records. The section does not define or describe the role of “Custodian of Records” to provide guidance as to what responsibility and authority is assigned to that role. Section 46 of the City’s Charter designates the Treasurer-Clerk as the “custodian... of all records and papers of a general character pertaining to the affairs of the municipality.” As with Section B of CP 140, the City Charter does not describe or define the responsibility or authority of the custodian of records.

The role and authority of custodian of record needs to be clearly defined.

According to the Merriam-Webster Dictionary, a custodian is “one entrusted with guarding and keeping property or records...” Based on that definition, it would not be unreasonable to incorrectly assume the Treasurer-Clerk has or should have, responsibility for and physical possession of all City records.

Today, the volume of records created and retained by the City is exponentially greater and in many different formats than when the Treasurer-Clerk was designated by the City Charter to be the custodian of records. At the time of our audit, the role of the Treasurer-Clerk as records custodian is a combination of maintaining a central repository for some City records (with the majority of City records maintained by the City department that generates the records) and coordinating the fulfillment of requests for public records by providing the applicable records when those records are in the custody of the Treasurer-Clerk or requesting the applicable records from City employees outside the Office of the Treasurer-Clerk when those employees have been designated to be a point of contact for those records.

While the Treasurer-Clerk’s current role as records custodian generally meets the City’s needs with respect to public records, certain issues were noted in the course of our audit procedures that indicate a need for the role and authority to be clearly defined. Specifically, 1) it is not

clear where responsibility for City compliance with Chapter 119 F.S. lies (e.g., redaction of exempt information, further discussed in Observation 4, and 2) the extent of the Treasurer-Clerk’s authority to directly access and retrieve City records maintained by other Appointed Officials.

When evaluating how the role of records custodian will be defined, the City should consider the volume, format, location, and costs associated with maintaining the City’s records and responding to requests for those records. Additionally, the City should consider the City Manager’s responsibility for the physical and virtual security of IT systems where records are maintained, which was confirmed by the City Commission on January 18, 2023.

Once the responsibilities and authority of the Treasurer-Clerk in the role of records custodian is determined, CP 140 should be updated to reflect that responsibility and authority.

Ministerial Amendments (CP 140.I.02)

This section of CP 140 authorizes the Treasurer-Clerk to periodically update CP 140 in response to legislative changes to the Public Records Act (Chapter 119, F.S.), other exemptions created or abolished by the legislature, or to incorporate new case law. When a ministerial revision is planned, the City Commission is to be notified and such revision shall become effective 10 days thereafter, notwithstanding the objection of any Commissioner.

The Ministerial Amendments section of CP 140 should be revised.

Although, when asked, Treasurer-Clerk management reported that they had not utilized the provision for ministerial amendments, the provision appears to contradict Administrative Policy and Procedure 100 (APP 100). APP 100 requires that any changes to a City Commission Policy must be brought before the City Commission for final approval. Upon inquiry, the City Attorney’s Office suggested that the modification of a commission policy by an appointed official without Commission approval might be inappropriate as it is not consistent with APP 100. Accordingly, we recommend the Ministerial Amendments section of CP 140 be revised so that it is consistent with APP 100’s requirements.

We recommend management review and revise CP 140 to:

- Explicitly define the role, responsibility, and authority assigned to the Treasurer-Clerk as City Charter designated custodian.
- Remove the authority provided in the Ministerial Amendments section authorizing the Treasurer-Clerk to make ministerial amendments without formal approval of the City Commission.

Observation 2

Review of Administrative Policy and Procedure 206

Upon review of APP 206, *City of Tallahassee Policy on Public Records Request Procedures*, we identified several areas where it appeared to conflict with provisions of CP 140. Such conflicts could potentially affect the efficiency and uniformity in which requests for public records are handled. We identified discrepancies related to:

APP 206 should be reviewed and revised for consistency with CP 140.

Reproduction Fees and Special Service Charges

As discussed in the Background section, CP 140 provides that the Treasurer-Clerk will not assess fees for reproduction costs where the number of printouts is less than 100 pages and will not levy a special service charge when the staff time to respond does not exceed two hours, in aggregate, on a single request. APP 206, however, only allows for up to five pages to be reproduced without charge and allows a special service charge for the extensive use of information technology resources and/or administrative time but does not provide any guidance on when to charge the fee.

Consequently, there is an increased risk fees associated with responding to requests for public records will not be assessed consistently.

Due to the amount of staff time required to fulfill a request for public records only being documented when a special service charge is assessed, we were unable to determine if the City consistently assessed special services charges as provided for in CP 140.

Applicability to City Departments

Our review of CP 140 revealed a discrepancy pertaining to public records responsibility when compared to APP 206. Specifically, CP 140 authorizes the Treasurer-Clerk, Tallahassee Police Department (TPD), and Tallahassee Fire Department (TFD) to adopt additional administrative policies necessary to carry out the public records function of the City as it pertains to their area of responsibility.

To ensure that requests for the review and/or copying of public records are accommodated in the most timely, efficient, and cost-effective manner possible, the Treasurer-Clerk created APP 206. APP 206 states that it applies to all City departments except the TPD and City Attorney's Office.

While TPD is authorized by CP 140 to adopt additional administrative policies and procedures for the handling and disclosure of law enforcement records, the City Attorney's Office is not provided similar authority. Consequently, there is no administrative policy and procedure addressing the handling and disclosure of City Attorney records. Conversely, TFD is

authorized to adopt additional administrative policies and procedures for the handling and disclosure of arson investigation records but is not excluded from APP 206 for that purpose.

Department Representative Responsibilities

As discussed in the Background section, APP 206 requires each City department to designate a primary and secondary representative to assist the Treasurer-Clerk in fulfilling requests for public records within their respective departments. While APP 206 does outline department representatives’ responsibilities regarding the timeliness of responses, it does not address other aspects of the public records process, including responsibility for redacting exempt information and stating the basis for the redactions.

We recommend management review and revise APP 206 so that the fees it authorizes for the reproduction of public records and the staff time to respond are consistent with CP 140. Additionally, APP 206 should be revised to make it applicable to any departments or functions that are not authorized in CP 140 to adopt their own administrative policies and procedures. Lastly, APP 206 should be revised to clearly define the responsibilities of department representatives.

If the City Commission determines that the City Attorney’s Office should have the authority to adopt its own administrative policies and procedures for the handling and disclosure of City Attorney records, CP 140 should be updated to reflect that authority.

Observation 3
Review of Administrative Policy and Procedure 706

Chapter 119, F.S., defines public records as “all documents... or other material, regardless of the physical form... made or received pursuant to law or ordinance or in connection with the transaction of official business by any agency.”

APP 706 versus APP 206 Regarding Personal Records

Our review of Administrative Policy and Procedure 706 (APP 706), *Personnel Policies and Procedures Manual*, revealed discrepancies when compared to APP 206.

APP 706 provides that access to electronic communication and information devices and systems is provided to employees for use in conducting official City business. Other than where specifically authorized, the City’s electronic resources and information systems are not designated or intended for personal use. An allowance is made for the incidental use of equipment for minimal non-City business use such as through the electronic bulletin board; through the scheduler for personal appointments; through e-mail for personal communications; or minimal internet use during an employee’s off-duty time such as a lunch break and where there is no cost to the City.

APP 206 and 706 should be reviewed regarding personal and public records.

APP 706 further provides that “all communications and transactions generated via the internet or through the City’s computer systems are considered City business and subject to the Public Records Law, Chapter 119.” APP 706 stipulates:

- E-mail messages are not considered private communications between two or more people and shall be public in nature.
- E-mail and data are not confidential and even unpublished data can be public and visible to technicians.

APP 206 provides that when there is a request for employee e-mails, the employee “will have three (3) business days after receipt to purge all ‘personal’ messages from their mailbox.” This policy conflicts with the provisions in APP 706 that all e-mail messages shall be considered public in nature.

In practice, the City does not filter out personal communications or other personal records and redacts information that would otherwise be exempt if they were a public record (e.g., social security number). Although the City may, as a policy, consider all communications and transactions generated via the internet or through the City’s computer systems to be public in nature, and there is no legal precedent addressing such a policy, the City does not have the authority to subject them to Chapter 119, F.S., if they do not otherwise meet the definition of a public record as provided in that law. As such, while the policy may be allowable, the language should be revised to be more accurate. For example, the policy would be more accurate if it stated that personal communications made on the City’s computer systems will be treated as if they are a public record rather than the current language providing that they will be subject to the “Public Records Law, Chapter 119, Florida Statutes.”

Additionally, our audit procedures did not identify any legal precedent pertaining to the disclosure of personal records when comingled with public records (e.g., e-mail). Accordingly, the City should consider the following when establishing or revising policies and procedures related to public records:

- the risk of releasing information that would be exempt from the Public Records Law (Chapter 119, F.S.) in a personal record (e.g., social security number) the City is not required to provide,
- the desired level at which records should be filtered; balancing the risk of providing non-responsive records (personal records) with the risk of not providing responsive records (potentially filtering out public records as personal records), and
- the time and other resources the City is willing to allocate to discern public versus personal records, including who would be responsible for making that determination and the additional time necessary to provide records.

When policies and procedures conflict and include inaccurate language, there is an increased risk requests for public records will not be fulfilled consistently.

We **recommend** the appointed officials determine how personal records comingled with public records should be handled when fulfilling requests for public records. Such discussions should include the risks associated with the different strategies for handling personal records. Once a decision has been made as to how personal records should be handled, it should be incorporated in all the relevant policies and procedures (e.g., APP 706 and 206).

Observation 4

Testing of Responses to Public Records Requests and Staff Interviews

As part of our evaluation of the City's process for responding to requests for public records, we tested a selection of City responses to requests for public records and interviewed certain City employees involved in the process of fulfilling requests for public records. Based on those two activities, we concluded that the City generally complies with the public records requirements provided for in Chapter 119, F.S. However, we did note City staff should be better trained as to the City's public records processes. Specifically, we noted the City does not have a formal training program on the requirements of Chapter 119, F.S., or the City's associated policies and procedures, thereby increasing the risk of not properly handling requests for public records.

A public records training program for City employees involved in fulfilling requests for public records could improve the process.

Testing of Responses to Requests for Public Records

To evaluate the City's compliance with key provisions of Chapter 119, F.S., we randomly and judgmentally selected 50 of the 767 requests for public records received by the Office of the Treasure-Clerk in 2022. Additionally, we submitted 9 requests for public records that included certain information that should be redacted (e.g., security video footage). The 59 requests for public records were tested to determine if:

- The responses contained exempt or confidential information (Section 119.071, F.S.).
- The requests were promptly acknowledged (Section 119.07, F.S.).
- Statutory citations were provided when exemptions were asserted (Section 119.07, F.S.).
- The requests were fulfilled timely. (*Tribune Co. v. Cannella*, 458 So. 2d 1075 (Fla. 1984)).
- Fees were assessed in accordance with CP 140.
- The City attempted to contact requestors when requests were overly broad.
- The provided records were complete.

Based on the 59 requests for public records tested, we found the City generally complied with Chapter 119, F.S. Specifically, we noted the City promptly acknowledged all 59 requests for public records we tested and timely fulfilled all requests for public records tested.

However, we noted the City should improve in satisfying requirements associated with redacting confidential and exempt information. Specifically, the records provided in response to 12 of the requests for public records we tested contained information exempt from public inspection and copying, and we noted issues with 9 of those 12 responses:

- Three (25%) included unredacted exempt information:
 - o one contained the social security number of a City employee,
 - o one contained the home address and personal phone number of an employee whose personal information was exempt from disclosure, and
 - o one contained the social security numbers and home addresses of two minors who participated in a City recreation program and identified their parents.
- Six items (50%) contained redacted information but did not include the statutory basis for the exemption asserted.

Public Records Process Interviews

To help ensure compliance with Chapter 119, F.S., and the City's policies and procedures, it is essential that employees involved in the process of fulfilling requests for public records have a good understanding of them. To determine how knowledgeable City employees involved in the process are, we judgmentally selected nine City employees involved in the public records process for interviews. Of the nine employees selected, three were Records Division employees, and six were department representatives from various City departments.

Based on our interviews, we determined that the Records Division employees provided suitable responses to the interview questions most of the time and had a good understanding of Chapter 119, F.S., and the City's policies and procedures. However, department representatives provided appropriate responses to a lesser extent and were not as familiar with the law and the City's policies and procedures. Our conclusion was based on interview questions that included, for example:

- What is a public record?
- If someone were to call your work phones and ask for documents, what steps would you take?
- Have you received public records training?
- What do you know about City public record policies and procedures?
- If a portion of a public record is exempt from disclosure, what steps must be taken?

In summary, our testing of the responses to requests showed the City substantially complied with key provisions of Chapter 119, F.S. However, we did note improvements could be made in complying with requirements related to redacting exempt and confidential information. Additionally, our interviews indicated that department representatives' knowledge of key public record requirements and processes could be improved. To increase compliance with

redaction statutory requirements related to confidential and exempt information and reduce the risk of noncompliance with other provisions of Chapter 119, F.S., we have concluded the City should develop and implement formal training related to public records.

We recommend management design and implement a public records training program for City employees involved in fulfilling requests for public records. Such training should include key aspects of the relevant State laws and City policies and procedures, and who is responsible for redacting and justifying the exemption of information.

Conclusion

Overall, we found that the City consistently complied with certain requirements of Chapter 119, F.S. (i.e., timely acknowledgment and fulfillment of requests for records), but improvements should be made for other requirements (i.e., redacting exempt and confidential information and providing the basis for redactions). Additionally, we determined the City's policies and procedures related to requests for public records promote compliance with Chapter 119, F.S., and incorporate best practices; however, revisions should be made to improve the efficiency and consistency of public records processes.

Appointed Official Responses

City Attorney:

I have reviewed the results of the recent Audit of Requests for Public Records. I appreciate that City's policies and procedures generally promote compliance with Chapter 119, F.S., especially in terms of timeliness and completeness. I agree that the City policies relating to public records requests should be consolidated and updated to better reflect current law and the realities of responding to public records requests in modern times and I look forward to working with the Office of the Treasurer-Clerk to accomplish this work. I also agree that additional training throughout the organization will enhance the accuracy and efficiency of the public records process and better ensure consistent compliance with the public records laws, especially with respect to the identification and redaction of confidential or exempt information from responsive records. I appreciate the thorough and thoughtful review of this issue by the Office of the Inspector General and I look forward to working collaboratively to meet the goals identified by the report.

City Manager:

We have reviewed the results of the Audit of Requests for Public Records. As noted, the current procedures promote compliance with Chapter 119, F.S. and leadership will continue to coordinate with the Treasurer Clerk on records response and actions in the Plan to ensure the security of City data and systems. We would like to thank the OIG staff for their review and work performed to advance the City's operations.

City Treasurer-Clerk:

We have reviewed the results of the Audit of Requests for Public Records and are pleased that the audit found the City's policies and procedures are consistent with the requirements of Chapter 119, Florida Statutes. We also appreciate the fact that the audit identified areas for improvement. A review of policies and procedures is already underway, and final changes will contemplate results of this audit. Similarly, we concur with the finding that additional training is needed and anticipate incorporating more formal training in our ongoing procedures. In the review of response to specific public records requests, we are pleased that responses were found to be timely, and we recognize that there are also areas for improvement. Areas for improvement will be addressed currently and will be targeted as points of emphasis in future training. We thank the Office of the Inspector General for their professional review and ongoing efforts to strengthen our City controls and processes.

Acknowledgements

We would like to express our appreciation to Records Division management and all staff for their cooperation and assistance during this audit.

Project Team

Engagement:

- Conducted by:** Johnny Hawkins, CIGA, Staff Auditor
- Supervised by:** Shane Herman, CPA, Audit Manager
- Approved by:** Dennis R. Sutton, CPA, CIA, CIG, Inspector General

Statement of Accordance

The Office of Inspector General's mission is to advance integrity, accountability, transparency, and efficiency and effectiveness within City government by providing professional, independent, and objective audit and investigative services.

We conducted this audit in conformance with the Institute of Internal Auditors' International Standards for the Professional Practice of Internal Auditing, and Generally Accepted Government Auditing Standards. Those standards require 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our objectives.

Please address inquiries regarding this report to the Office of Inspector General at (850) 891-8397 or inspector.general@talgov.com.

<http://www.talgov.com/transparency/inspectorgeneral.aspx>



MANAGEMENT’S ACTION PLAN		
ACTION PLAN STEP	RESPONSIBLE PARTY	COMPLETION DATE
Observation 1 - Review of City Commission Policy 140		
<ol style="list-style-type: none"> 1. We will expand the descriptions of the role, responsibility and authority of the City Treasurer-Clerk as custodian per City Charter. Consideration will be given to Florida statutes, relevant case law and administrative effectiveness. 2. The authority granted to the City Treasurer-Clerk to make “ministerial amendments” to Commission Policy 140 in Section I.02 will be evaluated to determine if it should be removed for consistency with Administrative Policy and Procedure 100 (APP 100-Introduction and Instructions for City Commission Policies Procedures Manual). 3. Based on the results of the efforts in Action Plan Steps 1 and 2, Commission Policy 140 will be revised accordingly. 	Jim Cooke	3-31-26
Observation 2 - Review of Administrative Policy and Procedure 206		
<ol style="list-style-type: none"> 1. The process, basis, and rates for assessing fees related to responding to requests for public records will be reviewed and updated. Commission Policy 140, APP 206, and other relevant policies and procedures will be revised accordingly 2. Authorization for adoption of any department-specific administrative policies and procedures will be reviewed and updated with said authorization to be properly documented and updated in CP 140. In addition, APP 206 will be reviewed and revised accordingly. 3. The role and responsibilities of departmental representatives involved with producing records in responding to requests for public records will be clarified and documented accordingly in APP 206. When revising APP 206, consideration will be given to the City Treasurer-Clerk’s responsibility and authority as clarified in Action Plan Step 1. 	Jim Cooke	3-31-26
Observation 3 - Review of Administrative Policy and Procedure 706		
<p>We will review processes and methodology for handling records and information not of a public nature when fulfilling requests for public records. Consideration will be given to Florida Statutes, relevant case law, and operational efficiency. Commission Policy 140, APP 206, and other relevant policies and procedures will be revised accordingly. Updates will be shared with Human Resources to ensure consistency with related aspects of APP 706.</p>	Jim Cooke	3-31-26

ACTION PLAN STEP	RESPONSIBLE PARTY	COMPLETION DATE
Observation 4 - Testing of Responses to Public Records Requests and Staff Interviews		
<p>We will develop a two-step training program for City employees who fulfill Public Records Requests. Training will help ensure City staff are knowledgeable of their duties and responsibilities. Step one will be training on the requirements of Florida Statutes. Step one training is expecting to be provided by representatives from the State of Florida's Department of State, Division of Library and Information Sciences. Step two will be training on processes and procedures specific to the City of Tallahassee. Step two training will be provided by the Office of the City Treasurer-Clerk and is expected to vary based on individual levels of responsibility for responding to requests for public records. For example, all staff need to have general awareness of Public Records Requests laws, but more specific training is needed for those responsible for directly responding to Public Records Requests.</p>	<p>Jim Cooke</p>	<p>3-31-26</p>