

# Automated External Defibrillator (AED) Inspection and Maintenance Program

Internal Audit Report  
September 6, 2022



Linda J. Lindsey, CPA, CGAP, School Board Internal Auditor  
Alpa H. Vyas, CIA, CRMA, Senior Internal Auditor

# Table of Contents

	Page Number
EXECUTIVE SUMMARY	1
DEFINITIONS	2
BACKGROUND	3
OBJECTIVE, SCOPE, AND METHODOLOGY	4
RESULTS AND RECOMMENDATIONS	5

# AED Inspection and Maintenance Program Internal Audit Report

## EXECUTIVE SUMMARY

### Why We Did This Audit

Our objective was to determine whether district follows the policies and procedures and Florida Statutes regarding the installation, maintenance, inspection of AEDs in district locations and related AED activities.

This audit was included in the 2022-2023 Annual Audit Plan.

### Observations and Conclusion

Audit Results at a Glance			
	Risk/Impact Rating		
Results and Observations	Significant	Moderate	Minor
IA – Internal Audit or M – Management	IA – 2 M – 1	IA – 3	M – 1
D – Deficiency or O – Opportunity	D – 2 O – 1	D – 1 O – 2	D – 1

Our overall conclusion is that while the Office of Safety has responsibility for oversight of the district’s AED program, it does not have enforcement authority over schools’ AED activities. Within the limits of their responsibility, the Office of Safety has initiated and effectively manages AED compliance at schools and tracks monthly inspection of AEDs by school personnel.

We noted high school AEDs are not registered with local medical agencies as required by Section 1006.165, Florida Statutes. We also noted inconsistent AED practices at schools.

### Results and Recommendations

Responsibility and Authority: The Office of Safety, as the subject matter experts, is responsible for development of school AEDs activities. However, the Office does not have enforcement authority over implementation of AED activities at schools for monitoring compliance. Currently, the Office of

Safety monitors school AED activities but cannot directly enforce the standards and guidelines they have developed.

Statutory Requirement: The Chief of High Schools and school Athletic Directors and Trainers were not aware of the statutory requirement to register AEDs at high schools with medical agencies. The Office of Safety contacted the Orange County Fire Department (OCFD) and Orange County Medical Director’s office they were also initially unaware of this requirement.

Procedures and Future Opportunity: We noted four areas where procedures and training should be improved, and an opportunity for the Office of Safety to consider as it moves into Phase 2 of the AED Program.

#### Recommendations:

We made seven recommendations, the most significant of which are highlighted below:

- District should combine enforcement authority with responsibility for the AED program to the subject matter experts – the Office of Safety.
- Office of Safety should follow-through to implement the AED location notification procedure with OCFD in accordance with Florida Statutory requirements.
- As the Office of Safety moves into Phase 2 of the AED Program, they should evaluate factors such as the size of the workforce, higher risk facilities, size of campus, and calculation of response time in determining the recommended number of AEDs and their locations for administrative and ancillary facilities

This report has been discussed with management and they have prepared their response which follows.

**DEFINITIONS:**

**Risk / Impact Ratings**

Minor	Low risk with a financial impact of less than one percent and/or an isolated occurrence limited to local processes (low impact and low likelihood)
Moderate	Slight to moderate risk with a financial impact between one and five percent and/or a noticeable issue that may extend beyond local processes (low impact and high likelihood or high impact and low likelihood)
Significant	High risk with a financial impact greater than five percent and/or a significant issue that occurs in multiple processes and/ or noncompliance with Florida Statutes or School Board Policies (high impact and high likelihood)

*We categorize risk/ impact as:*

- *Minor*
- *Moderate*
- *Significant*

**Observations Categories**

Opportunity	A process that falls short of best practices or does not result in optimal productivity or efficient use of resources
Deficiency	A shortcoming in controls or processes that reduces the likelihood of achieving goals related to operations, reporting and compliance

*We categorize our observations as opportunities or deficiencies.*

**Criteria for Observations Sourced to Management**

- Internal audit was informed of the issue prior to starting detailed testing
- Management identified, evaluated, and communicated the issue to appropriate levels of the district
- Management has begun corrective action with clear, actionable plans and targeted completion dates

Two of the findings were sourced to management. Because the Office of Safety just initiated the AED inspection and maintenance program in fiscal year 2021, the program is still evolving. As of September 2022, staff is in Phase 2 of this program.

## AED Inspection and Maintenance Program Internal Audit Report

### BACKGROUND:

Automated External Defibrillators (AEDs) are portable, life-saving devices designed to treat people experiencing sudden cardiac arrest, a medical condition in which the heart suddenly and unexpectedly stops beating. The AED system includes accessories, such as a battery and pad electrodes, that are necessary for the AED to detect and interpret an electrocardiogram and deliver an electrical shock.

Section 1006.165, Florida Statutes, (*Well-being of students participating in extracurricular activities*) applies year around to all high schools which are members of the Florida High School Athletic Association (FHSAA). According to this statute:

- AEDs should be available in a clearly marked and publicized location.
- AEDs must be registered with the closest emergency medical services centers.
- Employees or volunteers must be trained on AEDs and demonstrate proficiency on the AED by passing the training.
- The Athletic Director or Athletic Trainer should notify locations of each AEDs in writing to the trained volunteer or employees.
- Someone trained in the use in AEDs has to be present at all contests and practices held on campus, as well as workouts and conditioning during the offseason for the sport.

Prior to FY 2021, each school and administrative site purchased and maintained their own AEDs with limited guidance from district Health Services Group. High school AEDs were managed by those schools' athletic directors, but no one was managing, monitoring and assisting other schools or district facilities with AED-related activities.

Recognizing that this arrangement created a gap in effective management of this important life safety function, the Office of Safety, with approval of the Superintendent and Cabinet, developed and is implementing an initiative to oversee AED activities in a two-phase program. Phase 1, begun in FY 2021, involved inventorying and

*AEDs are for treating people experiencing sudden cardiac arrest.*

*Florida Statutes require AEDs at high schools which are members of the Florida High School Athletic Association.*

*Prior to 2021, there was no district oversight of AEDs except high school AEDs by athletic directors.*

*The Office of Safety developed and is implementing an AED management program.*

## AED Inspection and Maintenance Program Internal Audit Report

assessing AEDs located at schools. Phase 2, beginning in FY 2023, includes trainings, mock drills, AEDs at administrative sites and more. Key features of the AED program and descriptions of what is involved in each phase are in Appendix A.

The district has established a standard that exceeds that of Florida Statutes for the minimum required number of AEDs at schools as follows:

Type of School	Number of AEDs
Elementary	1
Middle and K-8	3
High	5

### **OBJECTIVE, SCOPE AND METHODOLOGY:**

#### **Objective**

The objective of this audit was to determine whether the district follows policies and procedures and Florida Statutes regarding the installation, maintenance, and inspection of AEDs in district locations and related AED activities.

#### **Scope**

The scope of the audit is fiscal year 2021- 2022 and the current fiscal year to September 2022.

#### **Methodology**

We conducted this audit in accordance with the *International Standards for the Professional Practice of Internal Auditing* of the Institute of Internal Auditors and included such procedures as deemed necessary to provide reasonable assurance regarding the audit objective. Internal Auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. It helps an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

*The district has established minimum AEDs according to school type.*

*We conducted this audit in accordance with the International Standards for the Professional Practice of Internal Auditing.*

## AED Inspection and Maintenance Program Internal Audit Report

We are required to note any material deficiencies in accordance with Florida Statutes, School Board Policy and sound business practices. No material deficiencies were noted in this audit. We also offer suggestions to improve controls or operational efficiency and effectiveness.

Details of our audit methodology included:

- Reviewed Florida Statute 1006.165 *Well-being of students participating in extracurricular activities*;
- Reviewed district AED Inspection and Maintenance procedures and guidelines;
- Reviewed SAP - OCPS Apps – Safety and Emergency Management Portal;
- Discussed with Office of Safety management and staff;
- Viewed AED manufacturer videos and reviewed internet resources;
- Reviewed AED Purchase Orders (POs) and invoices;
- Selected a sample of 16 schools for review of schools' AED monthly inspection checklists;
- From 16 schools, visited-through and observed 6 schools' AEDs onsite with AED designated staff, and interviewed designated staff;
- Reviewed AED training certificates;
- Analyzed SAP Asset Tag List and Office of Safety schools list; and,
- Contacted 6 schools which are not in SAP Asset Tag List for supporting documents of their AEDs.

### **RESULTS & RECOMMENDATIONS:**

#### **Overall Conclusion:**

Our overall conclusion is that while the Office of Safety has responsibility for oversight of the district's AED program, it does not have enforcement authority over schools' AED activities. Within the limits of their responsibility, the Office of Safety has initiated and effectively manages AED compliance at schools and tracks monthly inspection of AEDs by school personnel.

*No material deficiencies were noted.*

#### *Methodology:*

- *Reviewed statutes and procedures*
- *Researched best practices*
- *Visited schools*

*Within the limits of its responsibility, the Office of Safety has initiated and effectively manages the AED program in district schools.*

## AED Inspection and Maintenance Program Internal Audit Report

We noted high school AEDs are not registered with the local medical agencies as required by Section 1006.165, Florida Statutes. We also noted inconsistent AED practices at schools. Details of our findings follow.

**1) The Office of Safety has responsibility for schools' AED inspection and maintenance, however, does not have enforcement authority over AED compliance at schools for monitoring compliance. *Significant Risk, Opportunity***

### **Best Practice:**

Responsibility with enforcement authority is an effective way to succeed in monitoring and implementing policy, procedures, rules and regulations.

### **Audit Result:**

The Office of Safety, as the subject matter experts, is responsible for development of school AEDs activities. However, the Office does not have enforcement authority over implementation of AED compliance at schools. Currently, the Office of Safety monitors school AED compliance but cannot directly enforce the standards and guidelines they have developed. Enforcement is managed by the Administrative Team at each Learning Community.

### **Recommendation:**

The district should combine enforcement authority with responsibility for the AED program to the subject matter experts – the Office of Safety.

**2) High school AEDs are not registered with a local emergency medical service as required by Section 1006.165, Florida Statutes. *Significant Risk, Deficiency***

### **Best Practice:**

According to Section 1006.165, Florida Statutes, AEDs at high schools must be registered with the closest emergency medical services (EMS) centers if the high school is a member of the FHSAA.

*The Office of Safety has responsibility without enforcement authority for the AED program in district schools.*

*AEDs are not registered with local EMS as required by statute.*

*The district is required to register AEDs at high schools with local EMS centers.*



## AED Inspection and Maintenance Program Internal Audit Report

### **Audit Result:**

The district's high school AEDs are not registered with the closest emergency medical services centers. We inquired of the Chief of High Schools and school Athletic Directors and Trainers but they did not know about this requirement. The Office of Safety contacted the Orange County Fire Department (OCFD) and Orange County Medical Director's office, and concluded those County agencies also did not know of this Statute and the OCFD does not collect AED data for registration.

Through persistence and with assistance from the Internal Audit and Legal Services departments, the Office of Safety again contacted OCFD regarding this requirement. OCFD has now determined that it will accept district high school AED location data in their PulsePoint System. During an emergency time, the 911 dispatcher will refer bystanders to the school/location's nearest AED to assist a victim prior to arrival of an emergency team.

### **Recommendation:**

Office of Safety should follow-through to implement the AED location notification procedure with OCFD to comply with Florida Statutory requirements.

**3) School AED inspectors are not aware of Smartsheet link and other resources on SAP. *Moderate Risk, Deficiency***

### **Best Practice:**

Awareness of AED, its function, and usage of AED among staff creates willingness to use AED during an emergency situation.

### **Audit Result:**

Office of Safety developed a Smartsheet of *Monthly Site Administrator Inspection Portal* (MSAIP) which has AED inspection and maintenance procedures and guidelines, frequently asked questions, manufacturer training videos, monthly inspection checklist, and other information on AEDs. This Smartsheet can be accessed by any staff who have access through the SAP Portal – *OCPS Apps – Safety and Emergency Management Portal* link. The materials and information are excellent.

*OCPS management was not aware of the AED registration requirement.*

*Orange County EMS services also were not aware of it.*

*Through persistence, the Office of Safety got the OCFD to agree to accept high schools AED location data.*

*The Office of Safety has developed excellent resources about AEDs for schools.*

However, in our discussions with AED inspectors<sup>1</sup> at schools, we learned they are not aware of this link on the portal. An AED inspector inspects AEDs, completes a monthly checklist, and submits the completed monthly checklist to their location's AED Administrator. The location AED Administrator, who is usually a principal or assistant principal, may be aware of the Smartsheet and other resources as they enter AED inspection data into Smartsheet but they often don't share that information with staff members serving in other AED roles.

During onsite visits of sample schools, we noted that:

- One school's AED inspector did not have the *OCPS App* tab on her SAP Portal.
- One school's AED inspector was not comfortable opening the AED wall case with the alarm warning system on due to beeping noise.
- During interviews with AED inspectors, we learned some school staff are not fully aware that AEDs do not shock bystanders, rescuers, or patients.
- Some school staff believe only persons with CPR or AED training can use AEDs during an emergency.

According to [www.helpaheartcpr.com](http://www.helpaheartcpr.com) *Interesting Facts About AED's* dated 7/21/2020:

- AED shocks are not dangerous for a bystander, rescuer or healthcare provider or the patient.
- Beeping of warning alarm system will help others to know of emergency situation.
- Using an AED is much more effective than just doing CPR without an AED.
- Keep AED pads away from body piercings as metals are conductors of electricity. Care providers suggest moving the pads an inch away from the metal to perform AED treatment.
- Adult AED pads may be used on children and infants.

---

<sup>1</sup> Inspectors can be athletic trainers, registered nurses, assistant principals or school secretaries, for example.

*AED inspectors at schools we visited were not aware of the AED resources.*

*We learned during onsite visits that staff who are supposed to inspect AEDs were not trained and informed about their operation.*

*Useful and interesting facts about AEDs.*

## AED Inspection and Maintenance Program Internal Audit Report

Office of Safety should evaluate the above AED information and consider including it in AED trainings/communication to schools.

### **Recommendations:**

Create awareness of SAP Portal AED information among AED administrators, inspectors, and school staffs.

AED information, guidelines, and SAP Portal information should also be on OCPS Intranet from where any staff can read and become familiar with the AED, functions of AED, instructions, manufacturer training videos and other information.

**4) Out of our sample of 16 schools, three did not have the minimum number of AEDs called for by district AED Standards. *Minor Risk, Deficiency***

### **Best Practice:**

Per district AED Standards, elementary schools should have at least one AED, middle schools should have at least three AEDs and high schools should have at least five AEDs at their campuses.

### **Audit Result:**

Out of 16 schools we sampled, three did not have the minimum number of AEDs as noted below.

School	Learning Community	Number of AEDs on Campus	
		Required	Actual
Oakridge HS	High Schools	5	3
College Park MS	North	3	1
Ocoee MS	West	3	2

The Office of Safety was aware of these schools and regularly notifies Learning Communities when they notice any non-compliance of district AED Standards at schools, so the Learning Communities follow with their schools.

*More awareness of the excellent AED resources is needed. A reference or link on the district's intranet would also be helpful because employees are accustomed to using that source of information.*

*Three of 16 schools we evaluated had fewer than the recommended minimum number of AEDs on campus.*

## AED Inspection and Maintenance Program Internal Audit Report

### **Recommendation:**

Safety Staff and Learning Communities should continue to monitor schools' actual AEDs as compared to the minimum number of AEDs required for each school type.

5) *One middle school did not conduct periodic inspections of AEDs and did not complete and submit any Monthly Inspection Checklist since August, 2021. **Significant Risk, Deficiency***

### **Best Practice:**

According to the AED inspection guidelines, each school should inspect their AEDs monthly and submit a completed inspection checklist to the designated person. The designated person should enter the inspection data into district AED system.

### **Audit Result:**

Out of our sample of 16 schools, one middle school made no periodic inspections of AEDs and did not complete and submit the monthly inspection checklist to the designated person. No monthly inspection AED reports have been submitted by this school since August, 2021.

### **Recommendation:**

Learning Communities and Safety Staff should communicate and follow-up when a school does not submit its AED inspection report. Combining authority with responsibility in the Office of Safety as recommended in finding 1 will also assist in addressing this matter.

6) *AED activities are not consistent at Schools and schools need guidance from the Office of Safety on AEDs activities and compliance. **Moderate, Opportunity***

### **Best Practice:**

Consistent practices for AED activities at schools help to obtain positive results as well as to be compliant with district AED procedures and guidelines.

*One school conducted no inspections of AEDs for more than a year.*

*Timely follow-up is needed. Combining authority with responsibility will assist in addressing this matter.*

*Consistent practices result in better adherence to guidelines.*

## AED Inspection and Maintenance Program Internal Audit Report

### **Audit Result:**

During onsite visits of selected schools, we noted AED activities were not consistent at these schools and school staff need guidance from the Office of Safety on AEDs activities and guidelines

Observations of the 6 schools visited and examples of inconsistent practices are described below:

**Location of AED and Signage:** Noted no AED signage or AED signage was not at appropriate place. Signs were right above the AED wall case instead outside Gym (lobby), cafeteria (lobby), or outside clinic room. One school AED was outside of Gym in an open area, exposed to the elements.

### **Lock and Alarm Warning System:**

- Some schools had an unlocked AED wall case and the Alarm Warning System was OFF. We considered these devices to be unsecured.
- Some schools AEDs were locked with the Alarm Warning System ON. We considered these devices to be inaccessible during a cardiac emergency.
- Some schools AED was unlocked and Alarm Warning System was ON. We consider this as the **best practice**.

Beeping when the AED wall case is open helps surrounding people to know somebody has a health emergency. The beeping also helps to alert if a device is unsecured.

**Who can use AED:** Some schools have trainers list available beside every AED at schools and some schools do not. However, any bystander, trained or not, can use an AED as the device has instructions protocol once it is ON. This is important to know as sometimes no phone is available near an AED or the trainers list may not be updated frequently or there is no time to call a trainer during an emergency.

**School staff trainings:** One school did not inspect AED since August 2021. One school staff member was afraid to open the AED wall case

*We observed inconsistent practice in managing AEDs at the schools we visited.*

*Some schools' AEDs were stored in a manner that would make them inaccessible during a cardiac emergency.*

*Best practice is to have the AED unlocked and the Alarm Warning System ON.*

*Anyone can use an AED. No special training is required because the device guides the user.*

because of the beeping. The Office of Safety posted various manufacturer video links on SAP portal. However, school staff did not know of these training videos.

**Surplus AEDs:** School staff was not aware of surplus procedures for AEDs. Principal's approval is necessary prior to donation, disposal, recycle, or give away AED. Supporting documents of surplus AED should be maintained at school.

**Purchasing Accessories:** One school AED was not working because staff was waiting for batteries which were ordered a month ago and were still not in due to backlog. School should purchase spare accessories in advance.

**Mock Drill:** No schools are conducting AED mock drills. Mock drill standards are not established. Mock drills help staff become familiar with the AED and its functions. It helps to assess response time to emergency scenarios and to identify any flaws in procedures and protects life.

**Recommendation:**

The Office of Safety should include guidance on AED activities such as signage, locking and alarming system, usage, surplus, trainings, mock drills, and purchasing accessories in its resources to schools.

*7) As the Office of Safety moves into Phase 2 of the AED Program, they should evaluate factors such as the size of the workforce, higher risk facilities, size of campus, and calculation of response time in determining the recommended number of AEDs and their locations for administrative and ancillary facilities. **Moderate, Opportunity***

**Best Practice:**

Determining the number and location of AEDs should consider factors that help to achieve an optimal response time of 3 to 5 minutes after the person collapses (according to the [www.cpr.heart.org](http://www.cpr.heart.org) *Implementing an AED Program* by American Heart Association) and an assessment of the level of risk in a facility's environment, and size of workforce.

*Additional guidance addressing these matters should be provided to schools.*

*Looking ahead to Phase 2, the Office of Safety should assess a number of factors in determining recommendations of number and location of AEDs in administrative and ancillary facilities.*

## AED Inspection and Maintenance Program Internal Audit Report

### **Audit Result:**

Analysis for the number of AEDs and workforce, higher risk of facilities, size of campus, and calculation of response time is recommended during assigning the number of AEDs at different locations. Office of Safety is in Phase 2 AED program and the phase includes optimal response time analysis.

### **Recommendation:**

Office of Safety should consider major elements related to the number and location of AEDs in administrative and ancillary.

We wish to thank the Office of Safety, Property Accounting, and schools for their cooperation and assistance with this audit.

*Factors to consider  
include:*

- *Size of facility*
- *Size of workforce*
- *Nature of work performed*
- *Distance from nearest EMS*

## **Appendix A**

### **Office of Safety AED Program**

#### Phase 1:

- Conducted an audit of high schools AED programs.
- Developed and implemented a standardized AED program at all grade level of schools.
- Provides guidance on which brands to purchase and how to order AED using district iBuy system.
- Purchased AEDs and storage cabinets for approximately 30 schools who had no AED at their property.
- Developed training guidelines for inspecting AEDs.
- Developed a Smartsheet Application and Quick Response (QR) code for monthly checklist submission for tracking.
- Tracks monthly inspections at schools.
- Assists with any questions or concerns related AED.
- Reviews monthly inspection data.
- Communicates with School Principals and Administrators through Memo.
- Communicates with different divisions such as Teaching and Learning, Procurement, Maintenance, Health Services, Warehouse, Communication, and Foundation.
- Notifies Learning Communities if AED is out of compliance.
- Provides feedback if AED is out of compliance.
- Updates with the Cabinet for School Board.

#### Phase 2:

- Provide trainings to School Administrators, School Emergency Response team, and district staff on how to use an AED.
- Spot assessments.
- Review any gaps and analysis for sustainability options.
- Ensure AEDs meet the needs of school sites.
- Develop standards and processes of AED inspection and maintenance for administrative sites.
- Present to cabinet and explore options for financing of AEDs.





<b>Department / School Name</b>	<b>Safety and Emergency Management</b>
<b>Administrator / Department Head</b>	<b>Joseph Silvestris</b>
<b>Cabinet Official / Area Superintendent</b>	<b>Roberto Pacheco</b>

The results of the *Automated External Defibrillator (AED) Inspection and Maintenance Program Audit* were shared by Linda Lindsey, School Board Internal Auditor and Alpa Senior Internal Auditor, with Roberto Pacheco, Chief Operating Officer; Joseph Silvestris, Sr. Director of Safety and Emergency Management; and Jacqueline Hall, Director of Safety during the “Exit Meeting” held on Monday, October 24, 2020 at 8:30 am.

<b>Audit Result / Recommendation</b>	<b>Management Response Acknowledgement/ Agreement of Condition</b>	<b>Responsible Person (Name &amp; Title) And Target Completion Date (MM/YYYY)</b>	<b>Management’s Action Plan</b>
<p>The Office of Safety has responsibility for schools’ AED inspection and maintenance, however, it does not have enforcement authority over AED compliance at schools for monitoring compliance.</p> <p><b>Recommendation:</b> The District should combine enforcement authority with responsibility for the AED program to the subject matter experts – the Office of Safety.</p>	<p>Management acknowledges that currently the Office of Safety does not have enforcement authority over AED compliance at schools, but does have the responsibility for the oversight and management AED inspections and maintenance requirements. Therefore, do we consider this an opportunity; however, based on the strategies and procedures implemented to date, we do not consider it a Significant Risk as listed on the report.</p>	<p>Joseph Silvestris, Senior Director and Jackie Hall, Director</p> <p>6/30/2023</p>	<p><i>Corrective Action Plan:</i> Propose the adoption of a School Board Management Directive that outlines the enforcement authority for the AED Program throughout the District. This directive will outline the onus for compliance and enforcement under Teaching and Learning/Site Administrator and the Office of Safety will have oversight of compliance.</p>



<p>High school AEDs are not registered with a local emergency medical service as required by Section 1006.165, Florida Statutes.</p> <p>Office of Safety should follow-through to implement the AED location notification procedure with OCFD to comply with Florida Statutory requirements.</p>	<p>Management acknowledges this Deficiency. Although acknowledged, it should be noted that upon further investigation, it was revealed that Orange County Emergency Medical Services (OCEMS) does not require AEDs to be registered. Therefore, OCPS Athletic Department felt that District complied.</p>	<p>Bradley Paton, Manager</p> <p>Completed</p>	<p><i>Corrective Action Plan:</i> Prior to the completion of this Audit, the Office of Safety designed a submission portal to register all AEDs. This information was provided to OCEMS. This live portal will alert OCEMS if an AED should be deleted or added to the registry. Therefore, significant deficiency Risk has been removed.</p>
<p>School AED inspectors are not aware of Smartsheet link and other resources on SAP.</p> <p><b>Recommendation:</b> Create awareness of SAP Portal AED information among AED administrators, inspectors, and school staffs.</p>	<p>Management acknowledges that some personnel assigned the task of inspecting school AEDs are unaware of the Smartsheet link. This link was provided to Administrators during annual Preparedness Days (July 13-14). Administrators are responsible for entering and validating that all inspections are completed and accurate. Therefore, some administrators may not have shared this link with individual inspectors. The Office of Safety does not believe this is a deficiency or a risk to the District. However, valuable information can be shared with site inspectors that can be found on the Inspection Link.</p>	<p>Bradley Paton, Manager</p> <p>Guideline Completion 12/31/2022</p>	<p><i>Corrective Action Plan:</i> Update the Safety Guidelines for District Automated External Defibrillators (AED) to include:</p> <ul style="list-style-type: none"> <li>• Codes and Laws</li> <li>• Equipment</li> <li>• District guidelines for brands, signage, recommended locations, quantity</li> <li>• Purchasing Information</li> <li>• How to conduct inspections and submit inspections into the monthly inspection portal</li> <li>• Mitigation procedures</li> <li>• Troubleshooting</li> <li>• Safety Guidelines were updated in October of 2022 and information will be posted on the Intranet under the Office of Safety. Learning Communities shall be informed of these updates with recommendations to share these</li> </ul>



			guidelines and the AED Resource Center with site staff involved with the AED inspection process.
<p>Out of our sample of 16 schools, three did not have the minimum number of AEDs called for by district AED Standards. Minor Risk, Deficiency</p> <p><b>Recommendation:</b> Safety Staff and Learning Communities should continue to monitor schools' actual AEDs as compared to the minimum number of AEDs required for each school type.</p>	<p>Management agrees that this is a deficiency and a minor risk. It should be noted that no statutes require schools or other administrative sites to purchase and make available AEDs other than High Schools with Athletic Programs. Not one of our High Schools is out of compliance. This internal requirement was based on recommendations provided by the Office of Safety as a proactive measure and was supported by OCPS Leadership. Funding was provided during the 2021-2022 school year to ensure that all schools had a minimum of one AED. The Office of Safety purchased and issued an AED to all schools identified as having none.</p>	<p>Jackie Hall, Director 12/31/2022</p>	<p><i>Corrective Action Plan:</i> Send a communication to the three schools and their respective Learning Community reminding schools to budget for the additional AEDs.</p> <p>HS – Minimum of 5 MS and K-8 – Minimum of 3 ES – Minimum of 1</p>
<p>One middle school did not conduct periodic inspections of AEDs and did not complete and submit any Monthly Inspection Checklist since August, 2021. Significant Risk, Deficiency</p>	<p>Management recognizes that the identified Middle School was not submitting inspections. The Office of Safety issued communications. This school has a new administrator in charge of</p>	<p>Bradley Paton, Manager 12/31/2022</p>	<p><i>Corrective Action Plan:</i> Send communications monthly to the school site administrator and Learning Communities to validate the completion of inspections.</p>



<p><b>Recommendation:</b> Learning Communities and Safety Staff should communicate and follow-up when a school does not submit its AED inspection report. Combining authority with responsibility in the Office of Safety as recommended in finding 1 will also assist in addressing this matter.</p>	<p>AED inspections, and there has been no gap in the monthly inspections process since their commencement.</p>		
<p>AED activities are not consistent at Schools and schools need guidance from the Office of Safety on AEDs activities and compliance. Moderate, Opportunity</p> <p><b>Recommendation:</b> The Office of Safety should include guidance on AED activities such as signage, locking and alarming system, usage, surplus, trainings, mock drills, and purchasing accessories in its resources to schools.</p>	<p>Management recognizes that the Audit identified discrepancies for AED activities, but without specifics, the Office of Safety can only approach any corrections from a broad outlook. For example, further investigation is needed for locked AED cabinets or Cabinets without an alarm system.</p>	<p>Bradley Paton, Manager  06/30/2023</p>	<p><i>Corrective Action Plan:</i> Update the Safety Guidelines for District Automated External Defibrillators (AED) to include installation guidelines, cabinet alarm systems, and Q&amp;A on AED activities.</p> <p>Learning Communities shall be informed of these updates with recommendations to share these guidelines and the AED Resource Center with site staff.</p>
<p>As the Office of Safety moves into Phase 2 of the AED Program, they should evaluate factors such as the size of the workforce, higher risk facilities, size of campus, and calculation of response time in determining the recommended number of AEDs and their locations for administrative and ancillary facilities.</p>	<p>Management recognizes that Phase 2 of the AED Program should include factors such as the size of the workforce, higher-risk facilities, emergency response time, and recommendations for the placement of AEDs.</p>	<p>Jackie Hall, Director  8/15/2023</p>	<p><i>Corrective Action Plan:</i> The Office of Safety will look into current laws and regulations regarding the presence and availability of AEDs throughout OCPS Facilities. If warranted, the Office of Safety will develop a plan to research the factors identified by the Audit team based on current industry standards. Program expectations will need approval from OCPS Leadership with recommendations for</p>



<p><b>Recommendation:</b> Office of Safety should consider major elements related to the number and location of AEDs in administrative and ancillary.</p>			<p>resources if applicable, identification of AED responsible person, and the anticipation for the maintenance of such units. In addition, The Office of Safety will offer AED in-person training when available and provide alternative online training for all employees.</p>
---	--	--	---