REPORT ON ADMINISTRATIVE INVESTIGATION INTO MATTERS CONCERNING ROBERT ARMSTRONG'S EMPLOYMENT AND STOLEN PORT PROPERTY.

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INTRODUCTION

On or around June 17, 2013, the Executive Director for the Manatee County Port Authority ("Port"), was made aware that a Sherriff's investigation involving stolen Port property had concluded and a former employee, Robert Benton Armstrong, had been arrested. At the request of the Executive Director, the Port's counsel, Lewis, Longman & Walker, P.A. ("LLW"), conducted an administrative investigation into matters concerning Robert Benton Armstrong's employment and stolen Port property. Jennifer Cowan, an attorney with LLW, was the primary investigator. On or about June 17, 2013, Port employees were advised that they may be interviewed in relation to the administrative investigation, and were instructed that truthful cooperation in the investigation was mandatory and that no retaliation would result from the employee's cooperation.

Extensive interviews were conducted with Port staff. Those interviewed include: Sandy Arnold, Carlos Buqueras, Scott Davies, Tony Goyda, Ray Higgins, Frank Holden, George Isiminger, Brenda Jones, Mack McGaha, Walter Sharpe, Shawn Smith, David St. Pierre, William Stanfield, and Denise Stufflebeam. In addition, a number of relevant documents were reviewed.

The factual findings in this report are based on statements that have been corroborated by two or more witnesses or documents. However, as frequently occurs in investigations of this nature, many of the events are not documents and/or only one witness was available to interview concerning an event, and thus such events are identified as merely "reported as."

FINDINGS

Hiring of Robert Benton Armstrong

1. Prior to 2011, the Port required new employees to obtain both a Transportation Worker Identification Credential (TWIC) card and clear an Florida Department of Law Enforcement (FDLE) background check pursuant to section 311.12, of the Florida Statutes.

2. The TWIC card process involves a background check performed by the U.S. Department of Homeland Security (DHS). Generally there are three main concerns that could disqualify someone from receiving a TWIC card: (1) Immigration; (2) Security Threat; and (3) Criminal. Immigration concerns involve an individual who does not meet the immigration status requirements and security concerns involve an individual identified as having a connection to terrorist activity. Criminal concerns involve an individual who is wanted for any crime, under indictment for one of the specified disqualifying offenses, or has been convicted or incarcerated for those disqualifying felonies. Disqualifying offenses are divided into two categories: permanent and interim disqualifying offenses. Permanent disqualify offenses include espionage, sedition, treason, terrorism, murder, etc. Interim disqualifying offenses have to have occurred within seven (7) years prior to the date of application or the applicant has to have been released from prison within last five (5) years for one of the interim offenses: (1) Unlawful possession, use, sale, manufacture, purchase, distribution, receipt, transfer, shipping, transporting, delivery, import, export of, or dealing in a firearm or other weapon; (2) Extortion; (3) Dishonesty, fraud, or misrepresentation, including identity fraud and money laundering; (4) Bribery; (5) Smuggling; (6) Immigration violations; (7) Distribution of, possession with intent to distribute, or importation of a controlled substance; (8) Arson; (9) Kidnapping or hostage taking; (10) Rape or aggravated sexual abuse; (11) Assault with intent to kill; (12) Robbery; (13) Fraudulent entry into a seaport; (14) Violations of the Racketeer Influenced and Corrupt Organizations Act (RICO); or (15) Conspiracy or attempt to commit felonies listed above. The information DHS obtains in its background check is <u>not</u> provided to the Port. DHS either provides a TWIC card or refuses to provide a TWIC card.

3. The FDLE background check includes a criminal history screening. Section 311.12, of the Florida Statutes, lists the offenses that would disqualify an employee from access to the seaport. These disqualifying offenses include terrorism, violation involving a weapon of mass destruction, planting a hoax bomb, anarchy, trafficking, racketeering, dealing in stolen property, money laundering, bribery, any violation involving the sale, manufacture, delivery, or possession with intent to sell, manufacture, or deliver a controlled substance, conspiracy, etc. The information FDLE obtains in its background check is provided to the Port. The Security Department of the Port reviews the background checks and flags any concerns. Those concerns would then be conveyed to the Port employees involved in hiring the employee.

4. In 2011, the Florida legislature changed the provisions of section 311.12, of the Florida Statutes. Specifically, Chapter 2011-41 of the Laws of Florida deleted the provisions requiring FDLE to administer a statewide seaport access eligibility reporting system; allowing a seaport to charge any fee for administration or production of access control credentials that require or are associated with a fingerprint-based background check, in addition to the fee for TWIC; and requiring fingerprint-based state criminal history checks on seaport employee applicants, current employees, and other authorized persons. The Governor approved the bill and it became law on May 24, 2011.

5. On May 17, 2011, Robert Benton Armstrong (Robert) submitted a Manatee County Port Authority Employment Application seeking a position in Maintenance. On the Employment Application, Robert disclosed his father, Robert J. Armstrong (Bob) was employed at Port Manatee. Robert also disclosed that he had been convicted of a felony, possession of controlled substance. At that time Robert also agreed to the Pre-Employment Drug Testing and Fingerprint/Background Check.

6. On or about June 20, 2011, Robert underwent screening for the presence of illegal drugs or alcohol and the results were negative. In June 2011, Robert applied for a TWIC card. On June 27, 2011, Robert's TWIC card was activated and enabled for use.

7. On or about June 20, 2011, David McDonald, the then Executive Director of Port Manatee, approved Robert for hire as ground maintenance for the summer (OPS) at a rate of $10/hour. On June 20, 2011, Robert began work as a laborer in the Port's Maintenance Department. Robert's direct supervisor was Deputy Director of Maintenance, Shawn Smith. Mr. Smith's supervisor was the Senior Director of Engineering, Maintenance, and Environmental Affairs, George Isiminger.

8. The Port has adopted policies relating to hiring and the employment of relatives. Specifically, 5-102 Employment Application, Interview and Selection provides that a person must apply for employment in writing, the applications or resumes will be sent to the Executive Director, and the Executive Director and/or personnel reporting to the Senior Director of Business and Finance will screen the applications based on minimum criteria established by the job description. The applications of the two to five best qualified candidates will be interviewed by the department director, and then the department director makes a hiring decision subject to the approval of the Executive Director. Applicants must submit to a drug test. Section 5-102.3, specifies the requirements related to the employment of relatives.

> Relatives of Port Authority employees may be employed by the Port Authority provided they are in separate departments and there is no overlap of responsibility or supervision. The Executive Director will approve all such hires unless it involved his/her relatives in which case the Port Authority at a meeting thereof will approve/disapprove.

9. In summary, Robert disclosed both the familial relationship with a Port employee and his felony conviction. Robert passed the pre-employment drug test. DHS issued a TWIC card to Robert. At the time of hiring, David McDonald, Bob, and other employees were aware of Robert's felony conviction and prior history of drug abuse. Robert was hired as a laborer in the Maintenance Department, where he was in a separate department from Bob and there was no overlap in responsibility or supervision.

Promotion of Robert Benton Armstrong

10. It is reported that from late 2007 to September 2012, there was a freeze on pay raises given based on performance reviews. However, during this time period, employees who completed their probationary period or were promoted to different positions received pay raises.

11. Robert was employed as an OPS employee from June 20, 2011 to November 3, 2011. On November 3, 2011, Robert was hired as a part-time laborer in the maintenance department. Again, both the Executive Director and Department Director approved the hire. Robert was on probationary status for the first six (6) months of employment. During this time, Robert worked for both the Deputy Director of Operations and the Deputy Director for Maintenance. Both were pleased with Robert's work. On May 4, 2012, Robert's supervisor, Shawn Smith, emailed Denise Stufflebeam inquiring as to whether Robert's probationary period had ended and if so, stating that Robert was entitled to a 5% raise. Bob approved the raise as the Human Resource/Finance Director. Bob typically approved any employee's raise as part of his duties of the CFO and Senior Director of Business. On May 5, 2012, Robert received a 5% raise.

12. On June 16, 2012, Robert was hired as a full time employee. Both the Executive Director, Carlos Buqueras, and the Deputy Director of Maintenance, Shawn Smith approved the hire. Prior to the hire, Shawn Smith spoke to Bob to confirm that budgeted funds were available for a full time position. Witnesses confirmed that Bob never requested or suggested in any manner that Robert be hired at a full time position. Robert's title was changed to Warehouseman and his pay was increased from $10.50 to $12.50 per hour. Shawn Smith, as the Deputy Director of Maintenance, remained Robert's supervisor and Robert continued to work for both Maintenance and Operations.

13. On or around August 28, 2012, Shawn Smith completed a non-exempt staff performance review on Robert, wherein he rated Robert 4-5 (Normal/Expected/Exception to Exceptional). Mr. Smith wrote that Robert "has shown me he has many more abilities than just a warehouseman. He is doing a great job." At the conclusion, Mr. Smith recommended Robert for an increase in salary. On September 22, 2012, Robert was promoted from a Warehouseman to a CAD Specialist/Marine Specialist II and received a $1.98 per hour raise. This promotion and

raise was approved by the Executive Director and the Deputy Director of Maintenance. At this same time, Mr. Smith recommended at least 14 other employees under his direction for promotion and salary increase.

14. On September 8, 2012, Robert and 72 other Port employees received a merit increase, as approved by the Executive Director.

15. On March 23, 2013, six months after his promotion to CAD Specialist/Marine Specialist II, the Deputy Director of Maintenance approved a 75 cent per hour raise for Robert. At this same time, several other employees who had been promoted in September of 2012 received salary increases based on the completion of their probationary periods.

16. In accordance with the Port's policies, employees filling permanent full time or part time positions serve a probationary period for the first six (6) months. Employees who are promoted or demoted to a different classification serve a three (3) month probationary period. This period may be waived or extended upon request of the Department Director and Executive Director.

17. The Port has policies in section 5-400 relating to pay plans, promotions, and merit increases. Specifically the following sections are pertinent.

> Section 5-403.1 New Hires
> New hires will normally be paid the minimum of the assigned pay grade, unless otherwise approved by the Executive Director up to the mid-point of the grade for extenuating circumstances such as exceptional qualifications.
>
> Section 5-403.2 Promotions
> Employees promoted to a classification in a higher pay grade may receive a pay increase up to 15% over their current pay rate but at least to the minimum of the new pay grade. Employees whose positions are upgraded receive a pay rate of up to 5% or at least to the entry level of the new/upgraded position. All increases are subject to current fiscal conditions. An employee evaluation will be completed when an employee is promoted.
>
> Section 5-403.4 Pay Grade Maximum
> No employee's pay rate can be increased above the maximum pay rate of the pay range, excluding additional compensation including EEO, counselor pay, administrative adjustment or similar payments.
>
> Section 5-403.5 Merit Increases
> Notwithstanding pay increases listed above, merit increases are based upon attainment of standards of performance evidenced by a

> performance evaluation. The Executive Director determines, within the current year budget, the amount, if any, to be allocated for merit pay purposes. An employee is eligible for a merit increase based upon a "satisfactory" or better evaluation. Normal reviews will be conducted after the probationary period and annually. If an employee received a merit increase prior to their normal annual review date, their next review is scheduled one year from that date.

18. In summary, most of the salary increases Robert received resulted from reclassification from part-time to full-time, promotion, or completion of probationary periods. In September of 2012, Robert, along with all other Port employees, received a merit increase. At that same time, Robert was promoted and received approximately a 14% increase in salary associated with the promotion.

19. While most of Robert's raises and promotion were in accordance with Port policies and based on his supervisors recommendation, there is an issue of concern: Robert received a 19% salary increase at the time he was hired as a full-time Warehouseman, despite the policy maximum of 15%. Furthermore, it is unclear whether there was proper oversight of the cumulative change in the employee's position and the overall impact of an employee's salary increasing approximately $12,000 over a two year period. There was a lack of consistency in the signatures on the Action Request Forms. At times, the Action Request Forms bear signatures of the Executive Director, Employee, Department Director and Finance Department that signed on the Human Resource Director line. At other times, only one or two of these signature lines were completed, and the forms were not consistently signed by one individual within that capacity.

Termination of Robert Benton Armstrong

20. It is reported that on May 5, 2013, Robert notified his supervisor that he would be taking some time off. After multiple unsuccessful attempts to contact Robert, on May 31, 2013, the Deputy Director of Maintenance consulted with Bob on Robert's failure to return to work, and dismissed Robert from service with the Port. Witnesses confirm that Robert was dismissed for abandoning his position. The Action Request Form was completed and the termination was effective May 18, 2013, the end of the preceding pay period, after the employee failed to show for work. In accordance with section 5-504, entitled Absence Without Authority, any Port employee who is absent from his or her position of employment without notice or approval for a period of two (2) consecutive workdays is considered to have resigned without notice.

Drug Use

21. The Port has a Drug Free Workplace policy and conducts random testing in accordance with its policy. During Robert's employment with the Port, he was required

to and submitted to random testing multiple times. Each test produced a negative result.

22. It has been reported the following incident occurred: On January 16, 2013, it was suspected that Robert was in violation of the Port's Drug Free Workplace policy. At that time, the Drug Free Workplace policy was consulted and provided to Robert. Robert was asked whether he could pass a drug test and he confirmed he could not. Bob was informed of the suspicion and Robert's response. No other Directors were informed of the suspicion and Robert's response. Bob was asked if Robert should be escorted from the Port, and allegedly responded "it's not like he cannot do his job." Robert sat in his office until the conclusion of the work day and then left the Port to take a couple days off before returning to work. Robert was not required to be tested.

23. There was no paperwork or drug testing conducted related to this incident. The Drug Free Workplace policy "Procedure for Supervisors to Follow for Employees who are Believed to be under the Influence of Drugs or Alcohol or to have Consumed Drugs or Alcohol on Employer Premises" was not followed.

Gas Not Properly Logged

24. On May 6, 2013, about 8:55 p.m., Port Manatee Security Rover received a call to open up the Operations and Maintenance building for Robert. The Rover was out at Berth 5 working with two Port employees on lighting at the berth. The Rover asked the employees whether they had opened up the O & M Building earlier and explained that Robert was awaiting access. Since Robert had not been at work that day, one of the employees called the Deputy Director of Operations to explain what had occurred. The Rover proceeded toward the O & M Building when it received a call that Robert was able to get in and the Rover's assistance was no longer needed, so the Rover returned to Berth 5. One of the employees said he was going to go to the O & M Building to see what Robert needed.

25. It is reported that, when the employee pulled up to the O & M Building. Robert's car was backed up to the gas pumps and the pump nozzle was laying on the ground with a gas smell in the air. The employee went into the O & M Building, called his supervisor and was told to keep an eye on Robert. The employee allegedly talked to Robert briefly regarding directions to Cockroach Bay and then drove over to Access Control. The employee called his supervisor again and informed him that Robert had left the Port. The supervisor instructed the employee to get the times Robert was in and out of the Port that day. The employee entered the Access Control Building and requested that information. The employee then went back over to the O & M building and called the Rover at approximately 9:44 p.m.

26. The Rover came to the O & M Building and the employee explained to the Rover what he had seen, including Robert's car backed up to the fuel pumps, the nozzle on the ground, foot prints on the side of the fuel tanks. The employee then asked if the

Rover had pumped any fuel that evening. The Rover responded no and went to check to see if anyone else in security had received gas that evening. The Rover returned and stated that no one in security had received gas that evening. The employee stated that the O & M gas log showed the last employee to get gas was Aaron Washington with a pump reading of 1250.7, but the gas pump now read 1274.1, which meant there were 23.4 gallons of gas that were not logged. The employee once again called his supervisor and informed him of these findings. At approximately 10:26 p.m. the Rover notified the Director of Seaport Security and the Director told the Rover to write a report. Shortly thereafter, the Director of Seaport Security contacted Robert's supervisor, the Deputy Director of Maintenance, to let him know what had occurred.

27. The Rover wrote the report and placed it on the Director of Seaport Security's desk. The Rover did not obtain an incident report number for the report. The employee also wrote a report of the events and provided it to his supervisor. The employee was then told by his supervisor to keep a copy of the written report but to delete the electronic file. The employee followed his supervisor's instruction.

28. The following day, the Director of Seaport Security, the Deputy Director, and the Rover all met to discuss the report. The Director and Deputy Director reviewed videotape from the cameras that had views of the relevant areas. The video shows vehicles but no one is able to ascertain any details of the vehicles, including size, color, type, etc. The video showed that:

- 9:09 Vehicle pulls in O & M
- 9:10 Vehicle to fuel pumps
- 9:13 Second vehicle to fuel pumps
- 9:20 Interior light on in vehicle at fuel pumps
- 9:26 Vehicle leaves fuel pumps and heads to O & M with lights off
- 9:27 Vehicle intersection of N. Dock and Reeder Rd. The employee pulls up to the Access Control.
- 9:28-9:29 Robert's car leaving the Port.
- 9:33 p.m. The employee in the Access Control.

29. Additionally, the Director of Seaport Security, the Deputy Director, and the Rover went out to the gas pumps to inspect the pumps and to test how quickly the pumps could pump gas. They determined it took approximately 1 minute and 39 seconds to pump 13 gallons of gas.

30. The Director of Seaport Security also reviewed the Gate Report which supports that Robert entering the Port at approximately 8:40 p.m. and leaving at 9:28 p.m. Both the Rover and the Director of Seaport Security independently reviewed the gas logs. Several departments maintain their own gas log, but each gas log requires the same information be written in, including the date, equipment code, mileage, reading before and after, department, gallons, and signature of person filling up with gas. The gas logs demonstrate that on May 6, 2013, there were multiple fuel entries:

Date	Department	Reading Before	Reading After	Gallons
5/6/13	Admin. – Env.	1201.4	1211.7	10.3
5/6/13	Trade & Dev.	1211.7	1231.7	20
5/6/13	Maintenance	1231.7	1250.7	19
5/6/13	Security	1250.7	1257.2	6.5
5/6/13	Security	1274.1	1287.5	13.3

31. The logs demonstrate that on May 6, 2013, there were approximately 16.9 gallons of gasoline removed from that pump that was not logged.

32. There is no conclusive evidence as to whether gas was stolen. There were two employees that were at the pumps at the same time. There were 16.9 gallons of gasoline that was removed from the pumps at some time on May 6th that was not logged. There was a report by one of the employees that he found the fuel nozzle on the ground. The Director of Seaport Security did not interview alleged witnesses to the events. The investigation was not pursued beyond the above provided information.

33. Since this investigation began, Port security has updated security measures to ensure there is a tracking system for loaning out Port security property, deployed more video cameras, changed locks on gas pumps and restricted key access, installed more lights, adopted procedures for securing media and ensuring proper transfer of media, further restricted access to access control, modified reporting system to ensure reports are received and logged appropriately, modernized reporting system, and researched obtaining additional background checks.

Stolen Property

34. The Port has a Bosch Infrared Range Finder used to measure areas within the Port's warehouses. In or around October 2012, Robert was provided with the Infrared Range Finder to learn how to use it to measure warehouses. When he was questioned about its whereabouts, he replied that he could not find it. It is reported that Robert stated he had lost it in a warehouse and would replace it, and that Bob was informed in January 2013 of the lost Bosch Infrared Range Finder.

35. In March 2013, employees went to retrieve the InFocus/W240 65 inch video projector from the employee office where it was normally stored, and realized it was missing. The projector bag was there, but instead of holding the projector it held 2010 Port directories. Port staff searched for the item. It is reported that Bob was informed in March 2013 that the projector was missing.

36. It is reported that the following incident occurred in March 2013. The Deputy Director of Maintenance told Robert that his iPad was in his office under the drawings of the berths, in case Robert needed it. A few weeks later, the iPad was missing. Bob was informed that the iPad was missing and responded by saying "Don't worry about it, everything always shows up. You probably misplaced it." Robert was asked about the

iPad but denies having it. Later, Robert offered to help the Deputy Director of Maintenance turn on the tracking feature of the iPad. At that time the feature was already enabled, but the devise's location remained unknown. The next day the tracking showed the iPad as being located on Port property. Security was also told about this and confirmed there was no relevant video of this.

37. In or around March or April 2013, Port employees noticed one of the two portable air conditioner ("AC") units were missing from the men's gym. It was assumed that a tenant may have borrowed the unit. Shortly thereafter, the hose and connector left from the missing AC unit went missing. It is reported that Bob, as well as other port employees, was informed of the missing AC unit. Port Security reviewed security camera footage but did not find anything relevant.

38. From May 13, 2013 through May 14, 2013, the Manatee County Clerk of the Court's office (Clerk's office) staff accompanied by Port staff conducted the annual inventory of Port property valued in excess of $1,000. There were two assets that could not be located: an IBM Thinkpad laptop; and a Toshiba wireless projector. Port staff was advised that if the items could not be found then a police report would need to be filed. Port staff searched for the items through May 22, 2013. Port staff searched in the conference room and all of its furniture, the telephone room, all public spaces, all storage areas, offices, etc. On May 24, 2013, the Clerk's office inquired about the two missing assets. At that time Port staff contacted the Manatee County Sheriff's office to find out how to file a report on missing property. That same day, Bob is reported to have said "hold off on filing the police report." Port employees requested more time to find the missing items and the Clerk's office agreed.

39. On May 28, 2013, Bob informed Port staff that the laptop and projector were in the conference room. It is reported that Bob was asked whether he was referring to the big or little projector and he stated "I told you I found the damn thing, just call Michelle to come see it." Port staff found the laptop and the InFocus/W240 65 inch video projector in the conference room. Port staff immediately advised the Clerk's office that the laptop had been found but the asset tag had been removed. Port staff also sent photos of the laptop and its missing asset tag. On May 29, 2013, Port staff then advised the Clerk's office that the Port was going to search a little longer for the missing projector.

40. On May 31, 2013, Bob advised Port staff the projector was in the telephone room. Once again, Port staff went to the telephone room and found the Toshiba wireless projector. Port staff immediately advised the Clerk's office that the Toshiba wireless projector had been found, but the asset tag had been removed. Port staff also sent photos of the Toshiba wireless and its missing asset tag. The Clerk's office returned to the Port, verified the missing assets had been found and replaced the missing asset tags.

41. On June 3, 2013, Manatee County Sheriff's Deputies visited the Port and met with the Executive Director to go over the items that Robert had allegedly pawned. The Executive Director wrote down the items and their serial numbers and provided this to

Port staff. Port staff researched the items and discovered the items were Port property that had been missing. This included items Port staff had not previously realized were missing, including the Garmin Handheld GPS and the Sony Handy Camera. It is reported Bob contacted Port staff and suggested some of the items may not be Port property, and upon confirmation of those items as Port property he stated "thanks to you all Robert now has more charges."

42. On June 18, 2013, Bob provided a statement that he took his son to the pawn shop, where Robert purchased the laptop and projector, and returned to the items to Bob as a Port representative. Bob then returned the items to the Port, but did not inform anyone at the Port that the items had been stolen and purchased back from a pawn shop.

43. On June 27, 2013, Bob's employment with the Port was terminated.

CONCLUSION/RECOMMENDATIONS

Since the inception of this investigation, as discussed above, several remedial measures have been taken by Port Security to try to address concerns discovered throughout this process. Additionally, the Port has recently contacted the County and will be utilizing the County for the Port's human resources needs. During this investigation the Manatee County Clerk of the Court's office expressed a willingness to assist the Port in the review of its operation and development of proper internal controls, should the Port so desire.

This investigation was limited in scope to the matters addressed above. In light of the above findings which included policy violations, we recommend the Port consider the following:

1. Possible Policy Amendments

    a. Whether to amend the current policy to limit or prohibit future hires of family members.

    b. Whether to revise the current employee complaint procedure to provide a faster and more efficient process for handling employee complaints.

    c. Whether to update the Port's current policies to address changes in the law and workplace since the policy was originally adopted in 2005.

2. Development of Internal Controls and Procedures

a. Development of uniform internal control relating to the purchasing, maintenance, assignment, and control of all Port property (both asset and non-asset items).

b. Development of procedures that include Port Security and identify the proper process for dealing with stolen or missing property. These procedures should include any necessary steps in conducting an investigation, including an investigation into stolen or missing property.

c. Development of uniform internal processes for performance review, raises, promotions, and other personnel related actions.

d. Update organizational chart and job descriptions so supervisors and their full supervisory responsibilities are clearly identified.

e. Update and modernize, where feasible, internal controls utilized to track resource usage, such as fuel.

3. Provide a trained human resource officer/staff who can respond effectively to employee concerns and advise on the day to day human resource needs of the Port.

4. Provide necessary training to staff and supervisors, including:

   a. Supervisory staff on the policies governing Port staff and the responsibilities supervisors have under those policies (including but not limited to Drug Free Workplace Policy), with an opportunity for Q & A.

   b. Staff training on the Port's policies (including but not limited to Drug Free Workplace Policy), with an opportunity for Q & A.

   c. Each employee needs to have a clear understanding of who their direct supervisor is and the process involved in dealing with requests for procurement of goods/services, complaints/concerns, etc… This training should include when it is appropriate to depart from reporting to their immediate supervisor.

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