



The Florida Senate

Interim Project Report 2001-003

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Committee on Banking and Insurance

Senator James A. Scott, Chairman

EVALUATION OF THE TRANSFER OF WORKERS' COMPENSATION HEARINGS FROM THE DEPARTMENT OF LABOR AND EMPLOYMENT SECURITY TO THE DIVISION OF ADMINISTRATIVE HEARINGS

SUMMARY

As a result of legislation enacted last session (ch. 2000-165, L.O.F.), the majority of the functions of the Department of Labor and Employment Security have been eliminated or transferred to other agencies. Due to the diminished size of the department, it is anticipated that the remaining programs, including the Office of the Judges of Compensation Claims, will be transferred to other agencies.

Also, in recent years, concerns have been raised regarding the accountability of the judges of compensation claims. Proposals have been considered that would have transferred the workers' compensation hearings from the Office of the Judges of Compensation Claims to the Division of Administrative Hearings within the Department of Management Services or the Department of Insurance.

The Office of the Judges of Compensation Claims are responsible for hearing and resolving disputed workers' compensation issues under the authority of ch. 440, F.S.

The following staff recommendations address the transfer of the Office of the Judges of Compensation Claims to the Division of Administrative Hearings and related issues:

1. Due to the diminished size and jurisdiction of the Department of Labor and Employment Security, it is anticipated that the remaining programs of the department will be transferred. The Office of the Judges of Compensation Claims should be transferred, as a unit, to the Division of Administrative Hearings within the Department of Management Services.

2. Since the Office of the Judges of Compensation Claims is an agency of the executive branch, the merits of continuing the exemption from ch. 120, F.S., should be evaluated. If the exemption from ch. 120, is retained, the rulemaking process for the Office of the Judges of Compensation Claims relating to the application of the rules of procedures adopted by the Supreme Court and the rules promulgated by the Chief Judge should be clarified.
3. Create an agency clerk position within the Office of the Judges of Compensation Claims to receive petitions and serve as the custodian of records for the office.
4. Amend the current provisions of ch. 440, F.S., relating to the appointment and accountability of the judges of compensation claims to:
 - Create a workers' compensation judicial qualifications commission to investigate complaints against the judges of compensation claims and the Chief Judge and recommend to the Governor whether a judge should be disciplined or removed.
 - Require the judicial nominating commission to consider certain statutory requirements in evaluating a judge's performance.
 - Require the Office of the Judges of Compensation Claims to collect information from the judges necessary for the judicial nominating commission to conduct its review of the judges' performance.
 - Require the Office of the Judges of Compensation Claims to submit to the Legislature an annual report regarding the formal dispute resolution process for the prior fiscal year.

- Require a nominee for a judge's positions to be a member of the Florida Bar for the prior 5 years.
 - Require the Chief Judge to issue memoranda to the judges of compensation claims clarifying the application of uniform procedures, if the district offices are not consistently applying procedures.
5. Amend the following provisions of ch. 440, F.S., relating to workers' compensation hearings process to expedite the hearings process:
- Authorize the Governor to appoint a temporary judge of compensation claims in the event of a vacancy.
 - Authorize the judges of compensation claims to dismiss portions of petitions for benefits upon receipt of the petition for benefits.
 - Eliminate the docketing review by the judges of compensation claims.
 - Revise the 120-day requirement for lump sum settlements in order for the tolling of time to begin when the employer is notified of the injury rather than the date of the injury.
 - Eliminate the requirement for a hearing on lump sum settlements under s. 440.20(11)(a), F.S., if the claimant is represented by legal counsel and all parties agree to forego a hearing.
 - Require the written consent of the client after the first continuance of a final hearing.
 - Authorize the judges of compensation claims to enter an abbreviated final order in cases where compensability is not disputed.
6. Establish a uniform policies and procedures manual for the administration of the district offices.

Legislation (ch. 2000-165, L.O.F.) was enacted last session that significantly reorganized the Department of Labor and Employment Security by eliminating many programs and functions or transferring the programs or functions to other agencies. The number of positions in the department has decreased from 6,689.5 (fiscal year 1999-00) to 1,430 presently. The Division of Workers' Compensation and the Office of the Judges of Compensation presently have 609 and 179 authorized positions, respectively.

In recent years, concerns have been raised regarding the accountability of the judges of compensation claims. During the 2000 Legislative Session, a proposal was discussed, but not considered, that would have transferred the workers' compensation hearings from the Office of the Judges of Compensation Claims to the Division of Administrative Hearings within the Department of Management Services. Another legislative proposal, which passed the Senate (Senate Bill 1206), would have transferred the Office of the Judges of Compensation Claims to the Department of Insurance. The enactment of this bill would have resulted in the appointment of the judges by the Governor to another cabinet agency. In addition, this would have resulted in the Office of the Judges of Compensation Claims being placed in an agency that litigates workers' compensation claims on behalf of one of the largest employers in Florida, the State of Florida.

In 1994, legislation was introduced, but not heard, that would have transferred the Office of the Judges of Compensation Claims to the Division of Administrative Hearings. In addition, this legislation would have eliminated the appointment of the judges by the Governor, reclassified the judges of compensation claims as administrative law judges under the career service personnel status, and required the Chief Judge of Compensation Claims to report to the Director of the Division of Administrative Hearings.

BACKGROUND

Section 440.015, F.S., provides that "It is the intent of the Legislature that the workers' compensation law be interpreted so as to assure the quick and efficient delivery of disability and medical benefits to an injured worker..." The Division of Workers' Compensation, within the Department of Labor and Employment Security, is specifically charged with administering the Workers' Compensation Law in a manner that facilitates the self-execution of the system and the process of ensuring a prompt and cost-effective delivery of payments.

METHODOLOGY

Stakeholders of the workers' compensation system (insurance carriers, self-insured employers, advocates for injured workers, employee union representatives, attorneys, and research organizations) were contacted. In addition, employees from the Office of the Judges of Compensation Claims, the Division of Workers' Compensation, the Division of Administrative Hearings, and the Executive Office of the Governor were interviewed. The Banking and Insurance Committee staff also conducted an informal survey of stakeholders in the workers' compensation system.

FINDINGS

Informal Dispute Resolution Process

Presently, the Bureau of Employee Assistance and Ombudsman Office (EAO) within the Division of Workers' Compensation is responsible for administering the informal dispute resolution process. If disputes between an injured worker and a carrier/employer are not resolved within 30 days, the injured worker may file a petition for benefits.

According to the division, since 1994, the number of requests for assistance received on an annual basis, has increased from 45,466 to more than 119,000, with over 95 percent of all requests for assistance being filed by attorneys. Over 82 percent of the disputed issues on the requests are either not due and owing, or are not within the jurisdiction of the EAO to resolve.

In 1999, EAO implemented a statewide program, known as the Early Intervention Program, which is aimed at notifying injured workers regarding their rights under the law soon after the division receives the notice of injury. An evaluation of preliminary data (as of July 1, 2000) indicates that EAO has experienced a 30 percent reduction in the rate of requests for assistance filed and a 33 percent reduction in the rate of petition for benefits submitted for workers injured in 1999 that have participated in the program.

The Formal Dispute Resolution Process

An injured worker may not file a petition for benefits with the Office of the Judges of Compensation Claims until the employee has exhausted the informal dispute resolution process. The judges of compensation claims are responsible for hearing and resolving disputed workers' compensation issues under the authority of ch. 440, F.S.

Under the provisions of s. 440.192, F.S., the employee is required to serve the petition upon the employer, the employer's carrier, and the division. Within 14 days of receipt of a petition for benefits, the carrier must either pay the requested benefits without prejudice to its right to deny within 120 days of receipt of the petition or file a notice of denial with the division.

The division acts as the quasi-agency clerk and custodian of records for the Office of the Judges of Compensation Claims. Nine positions are responsible for entering data obtained from the petition for benefits and generating the docketing order. After imaging or copying the petition, the division prepares a docketing order for

each petition and refers the petition to the docketing judge. Once the filed petitions for benefits are available online, the turnaround time should be reduced significantly.

Upon receipt of the petition for benefits, the judge is authorized to dismiss the petition if the petition does not specifically identify or itemize certain information required by the section, including information regarding the employee, employer, the injury, employee's work responsibilities, benefits being requested, type of care being requested, and any other disputed issues, as delineated in s. 440.192, F.S. Presently, the statute does not specifically authorize the judge to dismiss a portion of the petition. If the petition is not dismissed, it is referred to the appropriate district.

Section 440.25, F.S., requires mediation conference to be held within 21 days after a petition for benefits is filed with the division. Only the Chief Judge is authorized to waive a mediation conference. Within 7 days after the petition filing, the judge of compensation claims is required to notify the parties that a mediation conference will be held. According to the Office of the Judges of Compensation Claims, for FY 1999-00, the average turnaround time from the receipt of the petition by the division and the scheduled mediation date was 145 days. If the issues have not been resolved within 10 days following the commencement of the mediation, the judge is required to hold a pretrial hearing.

The judge is required to provide the parties with at least 7 days advance notice of the pretrial hearing. At the pretrial hearing the judge sets a date for the final hearing that allows the parties at least 30 days to conduct discovery, unless the parties consent to an earlier hearing date. The final hearing is required to be held and concluded within 45 days after the pretrial. The judge is authorized to grant continuances, if the requesting party demonstrates that the reason for the delay arises from circumstances beyond the party's control. According to the Office of the Judges of Compensation Claims, 11,938 continuances for final hearings were issued for FY 1999-00. The judge is required to provide the parties with at least 7 days advance notice of the final hearing.

The judge is required to determine the dispute in a summary manner within 14 days after the final hearing. If the case is not determined within 14 days of the final hearing, the judge is required to formally notify the Chief Judge. According to the Office of the Judges of Compensation Claims, the average number of days from the date of receipt of the petition by the division to the

final disposition (final merit, settlement, or stipulation) is 220 days.

The Office of the Judges of Compensation Claims is the only agency located in the executive branch that is exempt from the rulemaking provisions of chapter 120, the Administrative Procedures Act. Although, s. 120.50, F.S., exempts only the Legislature and the courts from the provisions of chapter 120, s. 440.021, F.S., specifically exempts workers' compensation adjudications from chapter 120.

In 1993, s. 440.45, F.S., was amended to require the Chief Judge to promulgate procedural rules applicable to workers' compensation claim resolution and uniform criteria for measuring the performance of the office, including the number and timeliness of cases assigned and disposed, the age of pending and disposed cases, timeliness of decision making, extraordinary fee awards and other performance indicators. The section also provides that workers' compensation rules of procedure approved by the Supreme Court will apply until such rules promulgated by the Chief Judge becomes effective. However, s. 440.29(3), F.S., was not amended in 1993 and it provides that the practice and procedure before the judges would be governed by rules adopted by the Supreme Court, except to the extent those rules conflict with chapter 440, F.S. Therefore, the Chief Judges' Committee on Uniformity of Procedures decided that the new procedural rules would complement the rules drafted by the Workers Compensation Section of the Florida Bar and adopted by the Supreme Court. The rules adopted by the Supreme Court are incorporated into the draft uniform procedures. It is unclear whether the Legislature intended to continue to allow for this delegation of rulemaking to the Supreme Court, once the Chief Judge promulgated rules. A draft version of the Workers' Compensation Uniform Practices and Procedures has been developed and is scheduled for implementation on November 1, 2000.

The Administration of the Office of the Judges of Compensation Claims

Section 440.45, F.S., provides that the Office of the Judges of Compensation Claims is a separate budget entity, established within the Department of Labor and Employment Security, and not subject to the direction, supervision, or control of the department. The Chief Judge of the Office of Compensation Claims is responsible for the coordination of judges of compensation claims and mediators located in 17 district offices and serves as a liaison between the judges of compensation claims, the department, the Division of Workers' Compensation, and the courts.

Funding

The Office of the Judges of Compensation Claims is funded through assessments on insurance companies, self-insurance funds, assessable mutual companies, the Workers' Compensation Joint Underwriting Association, and self-insurers. The assessments on net premiums collected (or imputed for self-insured employers), which also fund the Division of Workers' Compensation, are deposited into the Workers' Compensation Administrative Trust Fund (WCATF). For FY 1999-2000, the assessment rate was 3.48 percent. For the period of July 1, 2000, through December 1, 2000, the assessment rate is 3.74. For the period of January 1, 2001, through July 1, 2001, the assessment rate will be 2.75 percent, which is the statutory cap effective January 1, 2001. For FY 1999-2000, the office was appropriated \$14.4 million.

Appointment Process

The process for selecting and appointing judges of compensation claims is delineated in s. 440.45, F.S. The Office of the Judges of Compensation Claims is administered by the Chief Judge of Compensation Claims who is appointed by the Governor for a term of 4 years from a list of nominees submitted by the statewide nominating commission. The Governor is also responsible for appointing district office judges of compensation claims from a list of three persons nominated by the statewide nominating commission. Section 440.45, F.S., provides for the appointment and terms of office for members of the statewide nominating commission. The statewide nominating commission is comprised of 5 attorneys appointed by the Board of Governors of the Florida Bar, 5 persons appointed by the Governor, and 5 laypersons elected by majority vote of the other members.

The nomination process for the judges is bifurcated by requiring that the nominating commission first determine if a current judge's performance is satisfactory, and if applicable, recommend reappointment of the judge to the Governor. If the Governor does not reappoint the judge, the commission submits a list of three nominees.

In order for a person to be eligible to serve as a judge of compensation claims, a person must be a member of the Florida Bar in good standing and be knowledgeable in the practice of law of workers' compensation. Presently, the law does not require a judge to have any minimum number of years of experience or certification by the Florida Bar in the practice of workers' compensation. However, mediators employed by the Office of the Judges of Compensation Claims are required to be a member of the Florida bar for at least 5 years and

complete a mediation-training program approved by the chief judge. Any person applying for the office of a circuit court judge or a county judge must have been a member of the Florida bar for the preceding 5 years to be considered eligible for the office (Section 8, Art. V, State Constitution).

The Chief Judge and judges must abide by the Code of Judicial Conduct, established in s. 440.442, F.S. Any material violation of the provisions of the code constitutes either malfeasance or misfeasance and is grounds for suspension or removal by the Governor. However, there is no statutory mechanism, such as the Judicial Qualifications Commission, to receive and independently investigate complaints and recommend the removal or the discipline of any judge that violates the provisions of s. 440.442, F.S.

The Judicial Qualifications Commission, created by Section 12, Art. V, State Constitution, is responsible for investigating and recommending to the Supreme Court of Florida the removal from office or the discipline of any justice or judge whose conduct demonstrates a present unfitness to hold office or whose conduct warrants such discipline. The commission is comprised of an investigative panel and a hearing panel, as established by rules of the commission. Upon a simple majority vote of the hearing panel, the panel may recommend to the Supreme Court that a justice or judge be subject to appropriate discipline. The Supreme Court may accept, reject, or modify the findings, conclusions, and recommendations of the commission and order a justice or judge to be subjected to appropriate discipline or be removed from office.

Staffing and Workload

For the current fiscal year, the office has 179 full-time positions (the chief judge, 31 judges, 31 mediators, and 116 administrative support positions). Each judge is assigned 2 support positions. The judge that serves as the senior or administrative judge is assigned 2-support positions, and the responsibility for supervising the position that serves as the receptionist. Generally, every mediator is assigned one support position.

During the preceding 2 years, the Division of Workers' Compensation received an average of 100,073 petitions per year. Of these petitions, an average of 91,296 (or 91 percent) were forwarded to the presiding judges during the same period. The Office of the Judges of Compensation Claims estimates that 3 petitions are filed per injury and will be ultimately consolidated into one petition. For the same period, an average of 3,277 final hearings were held, 2,622 final orders were issued, and

35,013 lump sum settlements were entered per year. An average of 19,701 mediations were also held per year. The average resolution rate for all issues, except for attorney fees, for concluded mediations, was 46.2 percent for the 2-year period.

Review of any order of a judge of compensation claims must be by appeal to the District Court of Appeal, First District. For 1999, the First District Court of Appeals disposed of 502 total cases, of which 274 were affirmed (54 percent), 54 reversed (11 percent) and 174 were disposed by administrative orders. The Clerk of the First District Court of Appeals reported that a total of 328 workers' compensation merit decisions were issued in 1999 of which 54 cases (16 percent) were reversed and 274 (84 percent) were affirmed. Two cases listed as unknown were nondispositive orders which did not finalize the case.

Results of the Survey of Stakeholders

The Banking and Insurance Committee staff conducted an informal survey of stakeholders in the workers' compensation system. The survey requested comments regarding the transfer of the judges of compensation claims to the Division of Administrative Hearings, as well as recommendations to enhance the current administration of the judges of compensation. Respondents provided the following comments:

Strengths of the Current Structure (located within the Department of Labor and Employment):

- mutual interest in the administration of the workers' compensation system
- availability and support of the department's legal counsel and personnel
- independence of the Office
- community-based access and service
- accountability provided by appointment process and monthly reports to the Chief Judge
- performance evaluation provided by the judges' reversal rate at the First District Court of Appeals

Weaknesses of the Current Structure:

- lack of agency clerk and custodian of records
- lack of legal assistants for judges
- vague lines of authority between the department and the Office of the Judges of Compensation Claims
- lack of authority to appoint temporary judges in the event of a vacancy
- unrealistic statutory deadlines

- inconsistent internal procedures for the district office (hours of operation and other administrative policies and procedures)
- no formal mechanism for the investigation of complaints against a judge
- no incentive to expedite hearing process
- inadequate number of judges and mediators

Recommendations to Improve Current Structure:

- provide training for new judges
- streamline hearing process
- require the written consent of the client after the first continuance of a final hearing
- eliminate the docketing review
- allow judges to enter an abbreviated final order in cases where compensability is not disputed
- penalize parties for groundless claims
- eliminate Request for Assistance Process and reallocate funding for mediators
- require pretrial stipulation for issues at trial. in the event impasse occurs at mediation; also, require parties to provide discovery plan and agree upon number of days required to prepare for trial, thereby eliminating the need for pretrial hearings
- create agency clerk
- provide legal assistants for judges
- create disciplinary board to investigate complaints against judges

Advantages of Moving the Office to the Division of Administrative Hearings (DOAH):

- DOAH has a long history of impartiality and administrative efficiency, potential for procedural innovation
- would increase ability of judges of compensation claims to confer with other judges to increase uniformity in procedures
- reclassification of judges as career service positions might reduce perception of political influence on judges' decisions

Disadvantages of Transferring the Office to DOAH:

- DOAH deals only with claims against the state
- possible adoption of chapter 120 rulemaking procedures for the adjudication of workers compensation claims, thereby compromising the application of the Rules of Workers' Compensation Procedures
- if all of the judges are located in Tallahassee, accessibility of the courts to litigants will be restricted

The Division of Administrative Hearings

As previously discussed, legislation has been filed and discussed in recent years that would have transferred the Office of the Judges of Compensation Claims to the Division of Administrative Hearings. The Division of Administrative Hearings (DOAH) provides independent administrative law judges to conduct hearings pursuant to ss. 120.569 and 120.57 (1), F.S., pursuant to other laws, and under contract with governmental entities.

The Division of Administrative Hearings is organizationally located within the Department of Management Services; however, the division is a separate budget entity and the director serves as the agency head. The department is required to provide administrative support and services to the division to the extent requested by the director. The division's budget is prorated among those agencies utilizing its services, based on number of hours scheduled. For FY 98-99, 28,051 hearings hours were scheduled; however a total of 22,207 hours were cancelled or continued.

The director of DOAH is appointed by the Administration Commission (Governor and the Cabinet) and confirmed by the Senate. The director of DOAH appoints assistant directors and the clerk of the division and employs administrative law judges and support staff. Presently, the division has 75 positions comprised of the director/chief judge, deputy chief judge, 37 administrative law judges, agency clerk, and 35 administrative support positions. The division's budget for fiscal year, 1999-00, is \$7.6 million.

Section 120.65, F.S., provides that any person employed by the division as an administrative law judge must have been a member of the Florida Bar in good standing for the preceding 5 years. The director, or chief administrative law judge, and any deputy chief administrative law judge must possess the same minimum qualifications as the administrative law judges employed by the division.

The Office of the Clerk of DOAH receives, docket, and maintains all pleadings and other legal documents filed with the division; assembles, certifies and transmits records on appeal to appellate courts for review of cases in which final orders are entered by an administrative law judge; responds to requests for information or copies of documents relating to cases filed with the division; and bills and collects monies for records on appeal and reproduced documents. The division's primary system application is an automated case management system and a full-text retrieval and document indexing application. The case management system includes a module that

allows the automated generation of form orders with minimal user input. Internet users can search DOAH's website to retrieve information concerning a particular case and the division's hearing calendar.

During calendar year 1999, the division processed 5,420 hearing requests (3,180 ch. 120 cases and 2,240 Baker Act cases). In 1999, the division held a total of 3,229 hearings and closed 5,362 cases. On average, each administrative law judge handled 175 new cases, conducted 104 hearings, wrote 90 recommended or final orders, and closed 173 cases.

RECOMMENDATIONS

1. Due to the diminished size and jurisdiction of the Department of Labor and Employment Security, it is anticipated that the remaining programs and functions of the department, will be transferred to another agency. The Division of Administrative Hearings already has the infrastructure established to provide case management, personnel, budget, and information systems support to the Office of the Judges of Compensation Claims. The Office of the Judges of Compensation Claims should be transferred, as a unit, to the Division of Administrative Hearings within the Department of Management Services. The position of Chief Judge could be reclassified as a deputy director that would act as administrator and report to the Director of the Division of Administrative Hearings.
2. Since the Office of the Judges of Compensation Claims is an agency of the executive branch, the merits of continuing the exemption from chapter 120, F.S., as provided in s. 440.021, F.S., should be evaluated. Presently, this office is the only entity within the executive branch of government that is exempt from the provisions of chapter 120, F.S., the Administrative Procedures Act. If the exemption from chapter 120, continues, the rulemaking process for the Office of the Judges of Compensation Claims relating to the application of the rules of procedures adopted by the Supreme Court and the rules promulgated by the Chief Judge should be clarified.
3. Create an agency clerk position within the Office of the Judges of Compensation Claims to receive petitions and serve as the custodian of records for the office and transfer the 9 positions presently performing this function within the Employee Assistance Office to the Office of the Judges of Compensation Claims. By eliminating the role of the Division of Workers' Compensation as the quasi-clerk and custodian of records, it is anticipated that the presiding judges will receive the petitions in a more timely manner. The implementation of a centralized case management system will assist the Chief Judge in assessing workload and performance trends and projecting resource needs for the office and would assist attorneys and other individuals seeking information concerning a particular petition, order, or agreement. Section 440.192, F.S., would need to be amended to require an injured worker to file a petition for benefits by certified mail with the employer, employer's carrier, and the Office of the Judges of Compensation Claims.
4. Amend the following provisions of ch. 440, F.S., relating to the appointment and accountability of the judges of compensation claims:
 - Create a workers' compensation judicial qualifications commission to investigate complaints against the Chief Judge and the judges of compensation claims and recommend to the Governor whether a judge should be disciplined or removed.
 - Require the judicial nominating commission to consider certain statutory requirements in evaluating a judge's performance.
 - Require the Office of the Judges of Compensation Claims to collect information from the judges of compensation claims necessary for the judicial nominating commission to conduct its review of the judges' performance.
 - Require the Chief Judge to submit to the Legislature an annual report regarding the formal dispute resolution process for the prior fiscal year, including workload statistics for the office and a summary of any statutory requirements that the judges are generally unable to meet. The report to the Legislature would replace the current joint report submitted with the Division of Workers' Compensation.
 - Require a nominee for a judge's positions to be a member of the Florida Bar for the prior 5 years.
 - Require the Chief Judge to issue memoranda to the judges of compensation claims clarifying the application of procedures in the event uniform procedure are not being consistently applied by the district offices.
5. Amend the following provisions of ch. 440, F.S., relating to workers' compensation hearings process in order to expedite the hearings process.

- Authorize the Governor to appoint a temporary judge of compensation claims in the event of a vacancy.
- Authorize the judges of compensation claims to dismiss portions of petitions for benefits upon receipt of the petition for benefits if the petition does not specifically identify or itemize certain information required by s. 440.192, F.S. The dismissal of any petition or any portion of such petition under this provision would be without prejudice and would not require a hearing.
- Eliminate the docketing review by the judges of compensation claims.
- Revise the 120-day requirement for lump sum settlements in order for the tolling of time to begin when the employer is notified of the injury rather than the date of the injury.
- Eliminate the requirement for a hearing on lump sum settlements under s. 440.20(11)(a), F.S., if the

- claimant is represented by legal counsel and all parties agree to forego a hearing.
- Require the written consent of the client after the first continuance of a final hearing.
 - Authorize the judges of compensation claims to enter an abbreviated final order in cases where compensability is not disputed, with the parties having an option to request separate findings of fact and conclusions of law. This change would assist the judges in meeting the 14-day deadline for entering a final order, as required in s. 440.25(d), F.S.
6. Establish an internal policies and procedures manual for administration of the district offices, including, but not limited to the areas of personnel, budget, purchasing, and office.

COMMITTEE(S) INVOLVED IN REPORT *(Contact first committee for more information.)*

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MEMBER OVERSIGHT

Senators Charlie Clary and James E. "Jim" King