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REPORT NO. 2019-25

TO: Craig Hare, Director, Emergency Medical Services Division
John Peterson, Chief Operating Officer, Sunstar Paramedics

CC: The Honorable Chairman and Members of the Board of County Commissions
Ken Burke, Clerk of the Circuit Court and Comptroller

FROM: Hector Collazo Jr., Inspector General/Chief Audit Executive 

SUBJECT: Investigation of Sunstar Paramedics Conflict of Interest

DATE: August 23, 2019

The Division of Inspector General's Public Integrity Unit (PIU) received allegations of Fraud, Waste, and Abuse. We investigated the following allegations related to Sunstar Paramedics.

The complainant alleged that the respondent, an active Sunstar Paramedics employee:

- Has a conflict of interest and engaged in unethical behavior by referring his/her students to apply for employment with Sunstar Paramedics so he/she could be paid a bonus as part of an incentive program.
- Violated Sunstar Paramedics' policy addressing conflicts of interest.
- Violated the Florida constitution by soliciting and accepting gifts or money via the recruitment incentive program.

The complainant also alleged that the Sunstar Paramedics management team:

- Engaged in unethical behavior for having knowledge of, promoting, and allowing the respondent to personally gain by recruiting his/her students for employment with Sunstar Paramedics.

The complainant did not provide documentation to assist with the investigation.



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To determine whether the allegations were substantiated, we reviewed policies, procedures, and any other records deemed appropriate. We also conducted interviews of staff and other parties, as needed. Our investigation was performed according to the *Principles and Standards for Offices of Inspector General* and *The Florida Inspectors General Standards Manual* from The Commission for Florida Law Enforcement Accreditation.

The Division of Inspector General uses the following terminology for the conclusion of fact/finding(s):

- **Substantiated** – An allegation is substantiated when there is sufficient evidence to justify a reasonable conclusion that the allegation is true.
- **Unsubstantiated** – An allegation is unsubstantiated when there is insufficient evidence to either prove or disprove the allegation.
- **Unfounded** – An allegation is unfounded when it is proved to be false or there is no credible evidence to support it.

The Division of Inspector General's investigation of the allegations has determined that the allegations noted above are **unfounded**.

Our conclusion of finding was based on the following evidence. We reviewed applicable policies for Sunstar Paramedics related to conflict of interest and ethical standards. Consequently, we confirmed the respondent did not violate any written policies. In addition, we verified there were no written policies related to the Bonus Referral Program, other than management was excluded from participating, as they have the ability to influence who is hired. We verified the respondent is not in a management position.

Finally, we reviewed applicable Florida Statutes related to the acceptance of gifts and money, and confirmed neither the respondent nor Sunstar Paramedics management would be subject to those statutes, as they apply to government officials and/or agencies. Sunstar Paramedics is the County's trade name the ambulance contractor operates under.

We appreciate the cooperation shown by the staff of Sunstar Paramedics during the course of this investigation.