



DIVISION OF INSPECTOR GENERAL

KEN BURKE, CPA

Clerk of the Circuit Court & Comptroller
Pinellas County, FL



AUDIT OF THE AMBULANCE PHARMACEUTICALS PROCUREMENT CONTRACT



Melissa Dondero, CPA, CIA, CIG, CIGA, CIGI, CITP, CRMA, CFS, CECFE
Inspector General/Chief Audit Executive

Audit Team

Darcy Eckert, CFE, CIGA, CIGI, CCA, CECFE, CFS, CGI - Assistant Inspector General
Natalie Steiner, MA, CPM - Inspector General I

REPORT NO. 2026-07
MARCH 13, 2026



KEN BURKE, CPA

Clerk of the Circuit Court & Comptroller
Pinellas County, FL

Clerk of the County Court • Recorder of Deeds
Clerk and Accountant of the Board of County Commissioners
Custodian of County Funds • County Auditor

Division of Inspector General

510 Bay Avenue, Clearwater, FL 33756
Telephone: (727) 464-8371 | Fax: (727) 464-8386
Fraud hotline: (727) 45FRAUD (453-7283)
www.mypinellasclerk.gov



March 13, 2026

David Hare, Interim Director, Safety and Emergency Services (SES)

We have conducted an audit of the Ambulance Pharmaceuticals Procurement Contract (Contract) based on a risk assessment. An Opportunity for Improvement (OFI) and Recommendation (Rec.) are presented in this report; see Table 1 for a summary classified by priority level.

During our audit we found that SES has implemented an effective invoice review process. Our review of invoices revealed that SES did not require one vendor to submit proof of receipt of medical supplies.

We appreciate the cooperation shown by the staff of SES during the course of this review.

Priority	OFIs	Recs.
 HIGH	0	0
 MEDIUM	1	1
 LOW	0	0
Total	1	1

Table 1 - Number of OFIs and Recs.

Respectfully Submitted,

Melissa Dondero
Inspector General/Chief Audit Executive

Approved:

Ken Burke, CPA*
Clerk of the Circuit Court and Comptroller
Ex Officio County Auditor

*Regulated by the State of Florida

cc: The Honorable Chair and Members of the Board of County Commissioners
Barry Burton, County Administrator
Matthew Spoor, Assistant County Administrator

TABLE OF CONTENTS

ABBREVIATIONS	4
REPORT SUMMARY	5
Overall Conclusion	5
Audit Objectives and Outcomes.....	6
Scope and Methodology	7
BACKGROUND	8
OPPORTUNITIES FOR IMPROVEMENT	13
1. SES Did Not Ensure Medical Supplies Were Received Prior To Issuing Payment To A Vendor.....	13

ABBREVIATIONS

Admin SS	Administrative Support Specialist
AP	Clerk's Finance Accounts Payable
CAC	Contract Administration Coordinator
Clerk	Clerk of the Circuit Court and Comptroller
Contract	Ambulance Pharmaceuticals Procurement Contract
County	Pinellas County
EMS	Emergency Medical Services
FOA	Finance Operations Analyst
FOT	Finance Operations Technician
FSD	Safety and Emergency Services Financial Services Division
FY	Fiscal Year
OFI	Opportunity for Improvement
Paramedics Logistics	Paramedics Logistics Florida, LLC
PO	Purchase Order
Rec.	Recommendation
SES	Safety and Emergency Services
Sunstar	Paramedics Logistics Florida, LLC
SWC	Sunstar Warehouse Coordinator

REPORT SUMMARY

Overall Conclusion

Our audit was conducted in accordance with the *Global Internal Audit Standards* of The Institute of Internal Auditors and the *Principles and Standards for Offices of Inspector General* of the Association of Inspectors General. Accordingly, it included such tests of records and other auditing procedures as we considered necessary in the circumstances.

Based on our independent and objective assessment, the department's risk management and internal control environment needed improvement for the scope of this audit. Governance was operating effectively and consistently applied to support the achievement of objectives in the area audited. Risk management and an internal control weakness existed, which may put at risk the achievement of objectives in the area audited. We identified areas of strength where controls are strong and aligned with the department's goals. However, we also identified an area of improvement to mitigate risks.

Opportunities for Improvement are prioritized based on the likelihood of the risk occurring and the impact the risk may have on the department's governance, risk management, and/or control processes as follows:

- Priority 1 (High) = Significant risk or impact on operating effectiveness and efficiency; audit findings indicate ineffective or lack of controls
- Priority 2 (Medium) = Moderate risk or impact on operating effectiveness and efficiency; audit findings indicate control weaknesses that may negatively impact the achievement of business objectives, reputation, and/or compliance
- Priority 3 (Low) = Minor risk or impact on operating effectiveness and efficiency; audit findings indicate opportunities to enhance the control environment



Figure 1 - Priorities

Our audit was neither designed nor intended to be a detailed study of every relevant system, procedure, or transaction. Accordingly, the OFI presented in this report may not be all-inclusive of areas where improvement may be needed.

Audit Objectives and Outcomes

The purpose of our audit was to:

1. Evaluate contract compliance for the purchasing of controlled substances, pharmaceuticals, and prescription required equipment.
2. Determine if there are sufficient controls in place related to invoicing for controlled substances, pharmaceuticals, and prescription required equipment.
3. Evaluate the controlled substances, pharmaceuticals, and prescription required equipment invoice process to determine any efficiency opportunities.

As a result of the audit, we determined:

1. The procurement process is in compliance with the Contract. The Contractor's, Paramedics Logistics Florida, LLC (Paramedics Logistics or Sunstar), staff determine when supplies are needed and create purchase orders (POs), which the Pinellas County's (County's) Contract Administration Coordinator (CAC) must approve in the inventory system, Envi. After the CAC approves the PO, vendors are notified and products are shipped to Sunstar.
2. We noted one opportunity for improvement related to invoicing for pharmaceutical supplies. One vendor does not provide packing slips or other documentation to show what supplies have been delivered and are being invoiced. Otherwise, there are sufficient controls in place for invoicing.
3. We did not note any efficiency opportunities related to the invoice process. When we started the audit, staff involved in invoice processing reported concerns about invoice timeliness due to the additional steps required by the Contract. However, during the audit, those issues were resolved, and invoices were processed in a timely manner.

Scope and Methodology

We performed a risk assessment of the procurement of pharmaceutical medical supplies. As a result of our risk assessment, the audit covered the controls over the invoicing of controlled substances, pharmaceuticals, and prescription required equipment as part of the Contract with Sunstar.

The audit period was October 1, 2024, through August 31, 2025. However, we did not limit the review of transactions and processes by the audit period and scope.

To meet the objectives, we performed the following:

1. Met with SES and Clerk of the Court and Comptroller (Clerk) Finance Accounts Payable (AP) staff to understand the procurement of pharmaceutical medical supplies process.
2. Reviewed the Contract, and County and Sunstar policies and procedures related to controlled substances, pharmaceuticals, and prescription-required equipment procurement.
3. Created process flow charts documenting the controlled substances, pharmaceuticals, and prescription-required equipment process from procurement through payment.
4. Performed sample testing of pharmaceutical invoices.

BACKGROUND

Contract Background

In 1980, the County's Emergency Medical Services (EMS) Authority was set up through a Special Act of the Florida Legislature. This Special Act led to a countywide EMS System. In 1988, a new EMS delivery model known as a "Public Utility Model" was formed, establishing Sunstar Paramedics as the sole countywide paramedic ambulance service. Under this model, the EMS Authority contracts with a private ambulance service to respond and transport all emergency 9-1-1 calls and non-emergency interfacility transports, under the County's trade name, Sunstar Paramedics. In this report, we refer to the private ambulance service contractor as Paramedics Logistics and Sunstar interchangeably.

Paramedics Logistics has been the sole provider for ambulance services in Pinellas County since 2004, providing Advanced Life Support, Basic Life Support, dedicated standby, long distance transports, critical care transports, and mental health transports in the County.

Effective October 1, 2024, the County entered a new five-year contract with Paramedics Logistics for ambulance services, with two three-year extensions available. The not-to-exceed contract value was \$491,358,925. Up until October 1, 2024, Paramedics Logistics paid for all ambulance services, including medical supplies related to its contract with the County, and the County reimbursed Paramedics Logistics monthly.

During contract negotiations, the County determined it should pay vendors directly for supplies that require a physician's license, since the County's Medical Director has the authority to purchase those supplies. The County's Medical Director assigned power of attorney to Paramedics Logistics to purchase the items, and the County pays the vendors directly. As a result, Paramedics Logistics and the County had to implement a new process for these invoices. Instead of Paramedics Logistics submitting an invoice to the County for reimbursement of all expenses paid in a particular month, Paramedics Logistics would send the County two types of invoice packages each month. One, referred to as Invoice Four, is an invoice for reimbursement or expenses paid. The second, referred to as Invoice Six, is a package of invoices with supporting documentation, such as packing slips and purchase orders. For this invoice package, the County would process and pay those invoices directly to the suppliers.

Contract Budget

SES budgeted and spent the following during Fiscal Year (FY) 2025 of the contract:

Contract Year	Budget	Actual
FY 2025	\$88,003,030	\$81,718,177

Table 2 - FY 2025 Contract Budget Information

SES Financial Services Division (FSD) uses internal mechanisms to track more detailed information about their budget. The following information, provided by the Department, represents the medical supply and pharmaceutical budget and actuals for FY25:

Contract Expenditures	FY 2025 Budget	FY 2025 Actual
Medical Supplies - Pharmaceuticals	\$7,843,973 ¹	\$ 3,257,592
Medical Supplies - Non-Pharmaceuticals		\$ 2,993,089
All Other Expenditures	\$ 80,159,057	\$ 75,467,496
Total	\$ 88,003,030	\$ 81,718,177

Footnote 1: SES FSD does not budget for pharmaceutical and non-pharmaceutical supplies separately.

Table 3 - FY 2025 Contract Expenditures

Contract Procurement & Invoicing

During the audit, we interviewed Paramedics Logistics, SES, and Clerk AP staff to understand the procurement and invoice process for each type of invoice Sunstar submits to the County. Below are three process flows we documented during the audit: Procurement, Invoice Four, and Invoice Six. Below are the color and shape keys, as well as each flowchart. The Procurement Process is completed first, and those purchases are billed to the County via Invoice Four or Invoice Six.

Color Code Key	
	Sunstar Warehouse Coordinator (SWC)
	SES Contract Administration Coordinator (CAC)
	Vendor
	Sunstar Inventory Management Assistant
	Sunstar Accountant
	SES FSD Accountant
	SES FSD Manager
	SES Director of EMS & Fire Administration
	Finance Operations Analyst (FOA)
	Finance Operations Technician (FOT)
	SES FSD Administrative Support Specialist (Admin SS)
	AP Finance Routing
	Process End

Figure 2 - Color Code Key

Shape Key	
	Decision
	Process Step
	Beginning/End of Process

Figure 3 - Shape Key

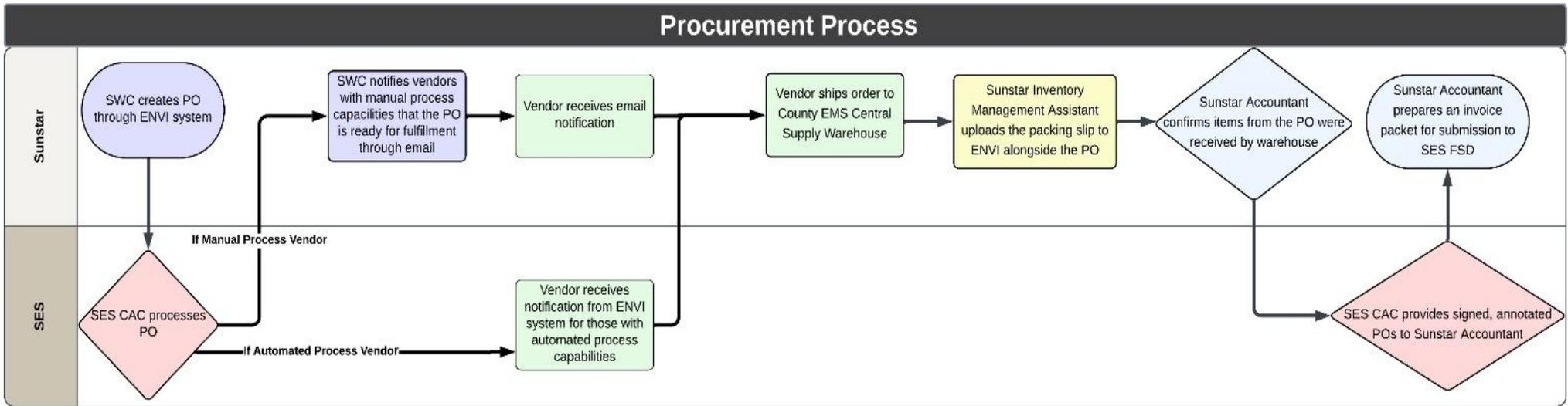


Figure 4 - Procurement Process

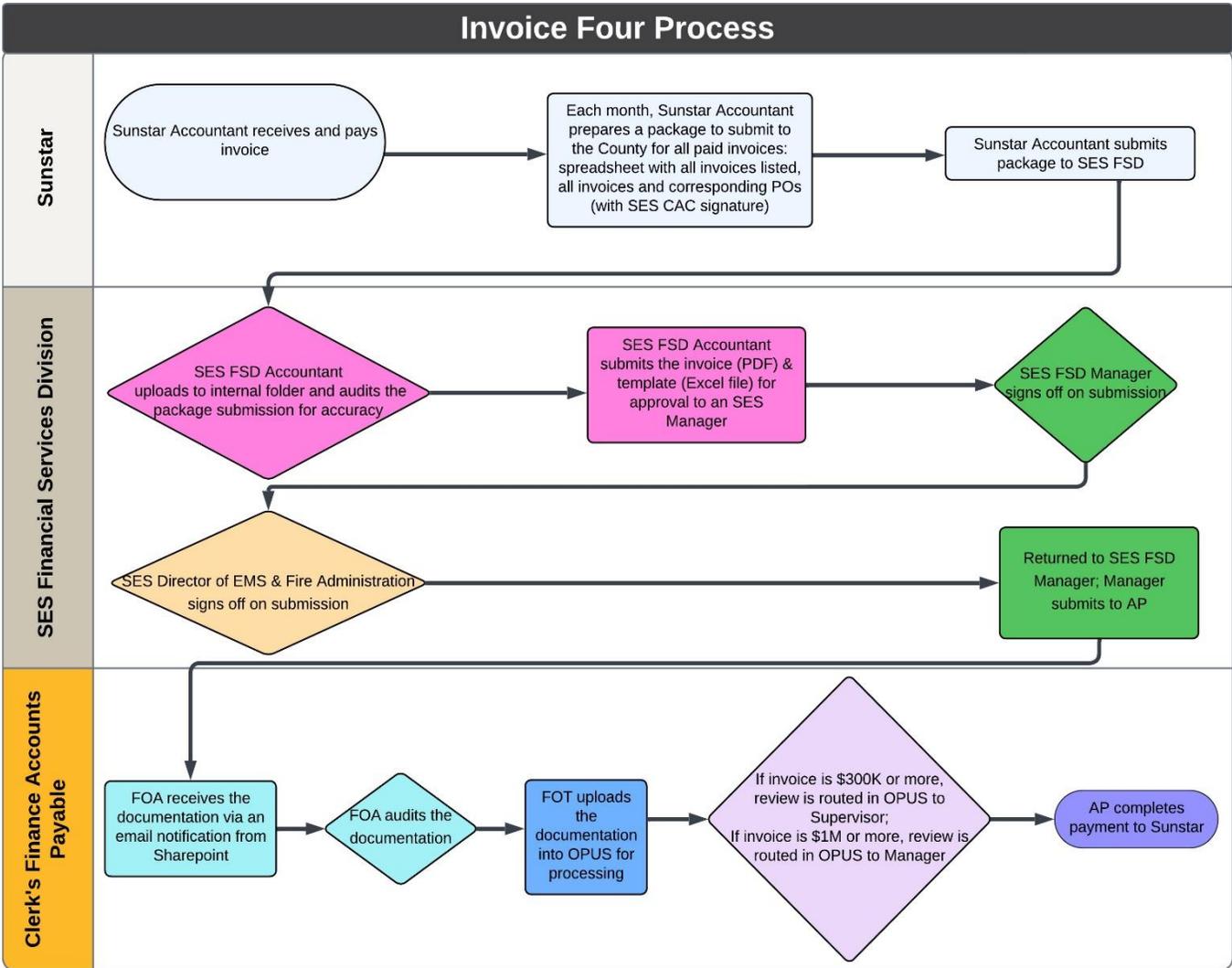


Figure 5- Invoice Four Process

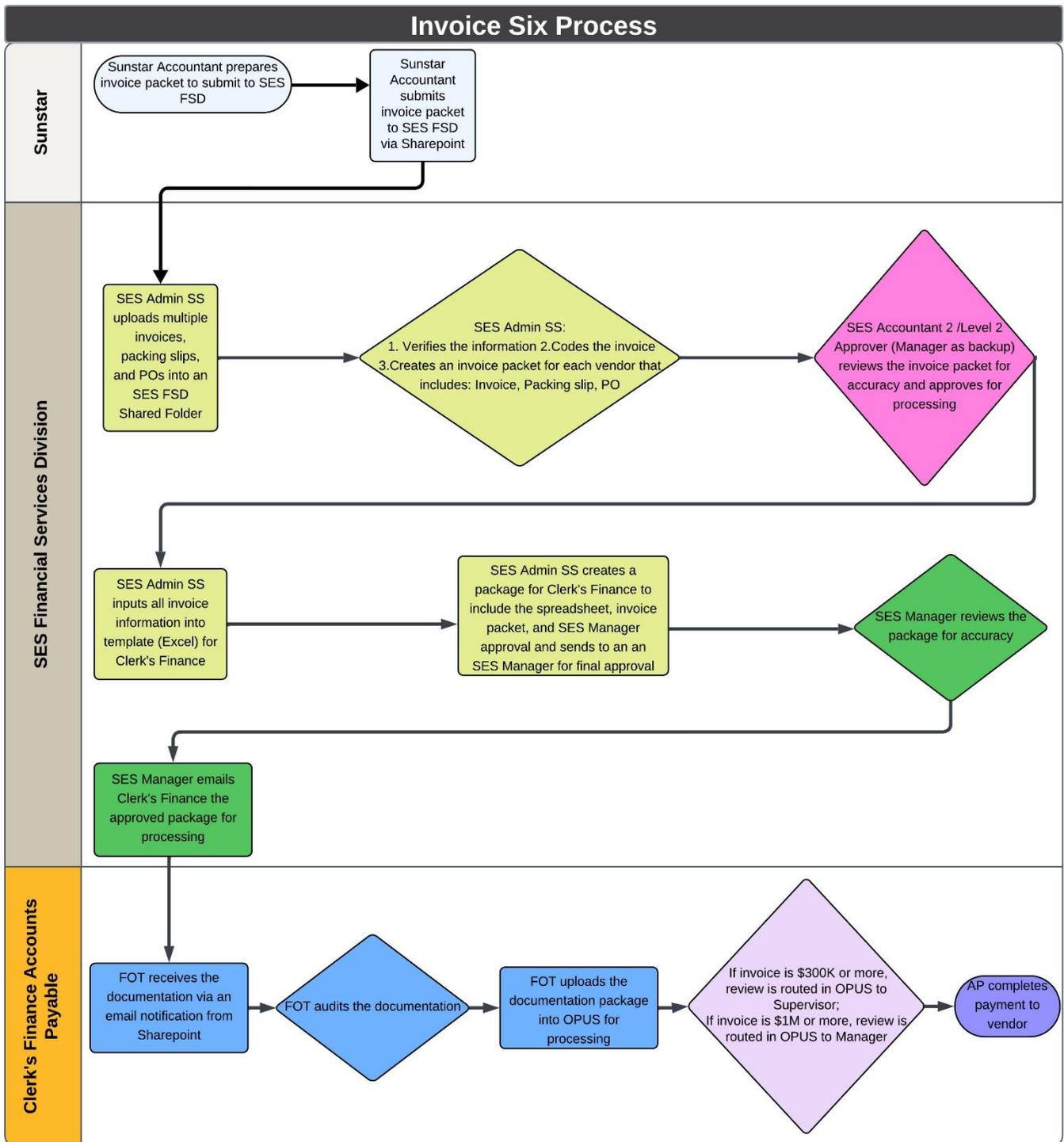


Figure 6 - Invoice Six Process

Our audit focused on the Invoice Six process to assess how it was operating and if any improvements were needed.

OPPORTUNITIES FOR IMPROVEMENT

1. SES Did Not Ensure Medical Supplies Were Received Prior To Issuing Payment To A Vendor.

MEDIUM

During the review of pharmaceutical invoices, we noted instances where one vendor's invoices were paid without documented evidence that the supplies had been received and accepted by Sunstar. From November 6, 2024, through September 17, 2025, the vendor invoiced \$126,842 for oxygen and oxygen-related supplies.

The vendor delivers oxygen to various Sunstar locations and fire stations within the County. Since staff is not always present at the locations, the vendor does not obtain signatures for the amount of oxygen provided. The vendor takes empty oxygen tanks from each location and replaces them with full tanks. Per SES, the total number of oxygen tanks used in the SES system is unknown, nor is the number assigned to each location. This is partly because sometimes an ambulance or fire truck will use oxygen tanks from one location and leave the empty tanks at another location.

The pharmaceuticals procurement Contract requires the contractor to adhere to the County's policies. The County's Purchasing Procedure Manual states the following:

"SECTION 3: METHODS OF SOURCE SELECTION

19. RECEIPT OF COMMODITIES AND SERVICES

Originating departments must complete the following steps upon receipt of commodities and services:

- A. Equipment, services or commodities shipped directly to the ordering department must be checked by that department as to accuracy, quantity and quality. Only after this has been accomplished should a delivery ticket or receiving report be signed. All exceptions are to be noted on the document signed. All claims should be processed in accordance with the county and/or carrier policies."*

SES indicated that since they have not implemented a practice to track the amount of oxygen the vendor provides, they rely on their trust of the vendor. Since the County started paying the vendor directly for oxygen as a result of the new Contract on October 1, 2024, we inquired with Sunstar staff to determine if they had a process in place prior to the new contract to track the amount of oxygen the vendor provided to them. Sunstar staff indicated they also trusted the vendor and relied on that as a control when paying the invoices.

By not ensuring that invoiced supplies were received, the County is exposed to an increased risk of overpayment, payment of supplies not received, and improper or fraudulent disbursements.

We Recommend Management:

Implement procedures to ensure that payments to the oxygen and oxygen-related supplies vendor are made only after receipt of the supplies has been documented and verified. This may include requiring receiving reports or other evidence of delivery to be reviewed and approved prior to payment.

Management Response and Action Plan:

Management Concur.

- ✓ **Individual(s) Responsible for Implementation:** Craig Hare, EMS & Fire Administration Director, SES
- ✓ **Planned Implementation Completion Date:** May 1, 2026



DIVISION OF INSPECTOR GENERAL

KEN BURKE, CPA

Clerk of the Circuit Court & Comptroller
Pinellas County, FL



SERVING YOU:
AUDIT SERVICES
INVESTIGATIONS
GUARDIANSHIP SERVICES
CONSULTING
TRAINING
COUNTY FRAUD HOTLINE
GUARDIANSHIP FRAUD HOTLINE
PCSO PREA HOTLINE

 mypinellasclerk.gov/Home/Inspector-General

 x.com/PinellasIG

 facebook.com/igpinellas

Call: (727) 464-8371

Fax: (727) 464-8386

Fraud: (727) 45FRAUD
(727) 453-7283

Write:

Division of Inspector General
510 Bay Avenue
Clearwater, FL 33756