

**DEPARTMENT OF FINANCIAL SERVICES**

**DIVISION OF AGENT AND AGENCY SERVICES**

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**Operational Audit**



## CHIEF FINANCIAL OFFICER

Pursuant to Article IV, Sections 4(c) and 5(a) of the State Constitution, the Chief Financial Officer is an elected member of the Cabinet and serves as the chief fiscal officer of the State. Pursuant to Section 20.121(1), Florida Statutes, the Chief Financial Officer is the head of the Department of Financial Services. During the period of our audit the following individuals served as Chief Financial Officer:

Honorable Jeff Atwater

From January 4, 2011

Honorable Alex Sink

Through January 3, 2011

The audit team leader was Jacqueline Joyner, CPA, and the audit was coordinated by Frank Belt, CPA. Please address inquiries regarding this report to Lisa Norman, CPA, Audit Manager, by e-mail at [lisanorman@aud.state.fl.us](mailto:lisanorman@aud.state.fl.us) or by telephone at (850) 487-9143.

This report and other reports prepared by the Auditor General can be obtained on our Web site at [www.myflorida.com/audgen](http://www.myflorida.com/audgen); by telephone at (850) 487-9175; or by mail at G74 Claude Pepper Building, 111 West Madison Street, Tallahassee, Florida 32399-1450.

DEPARTMENT OF FINANCIAL SERVICES

Division of Agent and Agency Services

SUMMARY

This operational audit of the Department of Financial Services (Department) focused on the Division of Agent and Agency Services' (Division) administration of its licensing functions. Our audit disclosed the following:

Finding No. 1: The Department had not prepared detailed analyses comparing particular categories of regulatory costs to the revenues designated to cover those costs.

Finding No. 2: The Division had not provided for adequate oversight of the information technology controls relevant to the system used to support Division licensing functions.

Finding No. 3: The Department had not properly assessed and collected certain required fees.

Finding No. 4: A significant number of investigations were not closed within Department-established time frames.

BACKGROUND

The Division of Agent and Agency Services (Division) issues and renews licenses and appointments for regulated insurance agents and agencies and investigates alleged violations of the Florida Insurance Code and related administrative rules. The Division utilizes two bureaus to carry out these responsibilities, the Bureau of Licensing and the Bureau of Investigation. During the period July 1, 2009, through February 28, 2011, the Division issued 114,766 licenses, issued or renewed 1,742,708 appointments, and collected fees totaling \$85,209,908. Currently, the Division issues over 140 different types of licenses, including those for life, health, and property insurance agents. Licensees cannot sell insurance until an insurance agency applies for and receives for the agent an appointment from the Division.

FINDINGS AND RECOMMENDATIONS

Finding No. 1: Regulatory Costs and Revenues

Section 624.523, Florida Statutes, establishes the Insurance Regulatory Trust Fund (Fund) and provides that moneys received and deposited in the Fund are appropriated for use by the Department and the Office of Insurance Regulation (Office) to defray the expenses of the Department and the Office in the discharge of their administrative and regulatory powers and duties as prescribed by law. With respect to the Department, Fund resources are used to pay for the operations of the Division of Agent and Agency Services, the State Fire Marshal's Office, the Division of Insurance Fraud, and several other Department-administered activities, including regulation of for-profit cemeteries and the provision of consumer assistance. EXHIBIT A provides a summary of Fund financial operations for the 2009-10 fiscal year.

From the 2005-06 through 2007-08 fiscal years, the Fund's balance grew from approximately \$88 million to \$162 million, primarily as a result of revenues, including insurance premium taxes and license fees, exceeding Fund expenditures and transfers. The Fund's balance then decreased during the 2008-09 and 2009-10 fiscal years to \$99 million at June 30, 2010. The approximate \$60 million decline in fund balance was attributable to several factors,

including a 2009 law change that redirected surplus lines tax revenues to the General Revenue Fund,<sup>1</sup> other appropriated transfers made to the State's General Revenue Fund totaling \$83 million, and debt service payments totaling \$34 million related to a project to replace the Florida Accounting and Information Resource System. While the Fund maintained a significant balance at June 30, 2010, we noted, as shown by Exhibit A, Fund expenditures and transfers-out to other funds exceeded revenues and transfers-in by approximately \$9 million. Amounts reported at June 30, 2011, showed that, prior to final year-end adjustments, the Fund's balance had increased to approximately \$111 million, with revenues and transfers-in exceeding expenditures and transfers-out by approximately \$12 million.

The Fund should maintain a reasonable balance. An excessively large balance may indicate that the revenues collected exceed the costs of industry regulation, while a deficit balance may indicate that revenues are not sufficient to cover authorized Fund expenditures. To help ensure the maintenance of a reasonable balance, mechanisms should be in place that allow a comparison of insurance industry regulatory costs to the associated revenues. While we found that the Department had, as a part of its Legislative budget requests, included summary level cash analyses for the Fund, the Department had not prepared detailed analyses comparing particular categories of regulatory costs to the revenues designated to cover those costs. For example, detailed analyses had not been prepared to allocate and compare all of the costs of regulating insurance agents and agencies to the revenues generated by these activities. Had such analyses been prepared, changes in licensing fee rates may have been indicated. We noted many of the insurance industry fees set by Section 624.501, Florida Statutes, have not been changed since 1993.

Absent periodic comparisons of the costs of industry regulation to the amounts of fees and taxes collected, the Department may be unable to readily demonstrate the rationale for established fee and tax rates.

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**Recommendation:** We recommend the Department conduct periodic comparisons of the costs of industry regulation and the associated designated fees and taxes. Any indicated need for changes in rates should be brought to the Legislature's attention.

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### **Finding No. 2: Information Technology Oversight**

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The Bureau of Licensing used the Agent Licensing Information System (ALIS) to record the issuance and renewal of insurance licenses and appointments and the receipt of related fees. ALIS is integrated with various other computer systems, including the Agent and Agency Licensing Function System, the Department of Insurance Continuing Education System, the ALIS/NIPR Data Interchange System, the NonResident Application System, and the eAppoint System.

On July 1, 2008, the Department entered into an agreement with a contractor to provide the Division with information technology services supporting ALIS. The information technology services included project management, system analysis, system design, system programming, testing and quality assurance, system implementation, support and maintenance of applications, and technical and business documentation.

Given the reliance placed on ALIS, it is incumbent upon the Division to take steps to reasonably ensure the integrity, reliability, and security of ALIS data. Such steps may include requiring the contractor to provide an independent auditor's assessment of the effectiveness of relevant information technology controls or Department monitoring of the effectiveness of relevant contractor controls. Our audit disclosed that the agreement with the contractor did not include a provision for an independent auditor's assessment of relevant internal controls and that the Division had not

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<sup>1</sup> Section 9 of Chapter 2009-70, Laws of Florida, amended Section 626.932, Florida Statutes, to require deposit of surplus lines premium receipts taxes into the State's General Revenue Fund.

requested or received such a report. We also noted that the contract did not authorize a Department review and that the Department had not evaluated the contractor's internal controls.

Absent an evaluation of the relevant contractor controls, Division management has reduced assurance that relevant internal controls are in place and effectively functioning.

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**Recommendation:** Because of the critical nature of the data maintained by ALIS, we recommend that the Division amend the information technology services contract and that the Department make or obtain an independent periodic assessment of the contractor's relevant internal controls.

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### Finding No. 3: Appointment Fees

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When circumstances warrant, Florida law requires the Department to assess and collect certain delinquency fees. As discussed below, our audit disclosed situations in which the Department had not assessed amounts due:

- Pursuant to Florida law,<sup>2</sup> if an appointing entity fails to notify the Department within 45 days of making a new appointment, the Department is to assess the appointing entity a \$250 delinquency fee. According to data recorded in ALIS, the Department processed approximately 738,000 initial appointments during the period July 1, 2009, through February 28, 2011. Our review disclosed that the Department did not assess delinquency fees when appointing entities failed to notify the Department of an appointment within 45 days. Department records indicated that 17,488 of the 738,000 notifications of initial appointments were made from 1 to 560 days after the 45-day period had elapsed. The moneys that would have been generated by the assessment and collection of the delinquent fees would have totaled approximately \$4,372,000.
- Pursuant to the Florida Administrative Code (FAC),<sup>3</sup> unless suspended, revoked, or otherwise terminated at an earlier date, insurance agent appointments must be renewed every 24 months. Florida law<sup>4</sup> requires the Department to assess a \$20 fee for late renewals. Department records indicated that the Department processed approximately one million appointment renewals during the period July 1, 2009, through February 28, 2011, of which 48,769 were received between 1 and 451 days late. Late fees, had they been assessed, would have totaled \$975,380.

In response to our inquiries, Division management indicated that significant law changes and computer application issues had prompted a decision not to assess the delinquency fees described above. Division personnel also indicated that system modifications were underway and the necessary program modifications to make the assessments should be completed prior to June 30, 2012.

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**Recommendation:** We recommend that the Department continue its efforts to implement procedures to assess and collect all required fees.

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### Finding No. 4: Timeliness of Investigations

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The Bureau of Agent and Agency Investigation (Bureau) investigates alleged violations of the Florida Insurance Code. When warranted, completed investigations are referred by the Bureau to the Legal Processing Unit (LPU) or to a law enforcement agency for possible action. The Bureau considers an investigation closed when no further action is required by Bureau personnel or after it has been referred to the LPU or a law enforcement agency.

<sup>2</sup> Section 626.371(3)(a), Florida Statutes.

<sup>3</sup> Section 69B-211.04, Florida Administrative Code.

<sup>4</sup> Sections 624.501(28) and 626.371(3)(b), Florida Statutes.

Bureau policies included case performance standards which stipulated various time frames to close an investigation that, depending on the severity and number of violations, ranged from 45 to 263 days. Data provided by the Bureau disclosed a total of 5,297 investigations were closed during the period of July 1, 2009, through February 28, 2011. Our analysis of closed cases disclosed 1,405 investigations (27 percent) were not closed within the Bureau's stipulated time frames. On average, the cases were closed 129 days late. The untimely completion of investigations increases the risk that unfair or fraudulent practices will continue.

For 22 of the investigations that were not closed timely, we inquired of Department personnel regarding the causes for the delays. Department personnel indicated that heavy investigative caseloads and problems in obtaining information from the investigated parties' attorneys caused the delays. Bureau personnel also indicated that staff would be reviewing established time frames to evaluate the reasonableness of Bureau policies.

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**Recommendation:**     **We recommend the Bureau take steps to improve the timeliness of investigations.**

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### OBJECTIVES, SCOPE, AND METHODOLOGY

The Auditor General conducts operational audits of governmental entities to provide the Legislature, Florida's citizens, public entity management, and other stakeholders unbiased, timely, and relevant information for use in promoting government accountability and stewardship and improving government operations.

We conducted this operational audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

This operational audit focused on the Division of Insurance Agent and Agency Services' licensing and investigation functions. The overall objectives of the audit were:

- To evaluate the effectiveness of established internal controls in achieving management's control objectives in the categories of compliance with controlling laws, administrative rules, and other guidelines; the economic, efficient, and effective operation of State government; the relevance and reliability of records and reports; and the safeguarding of assets.
- To evaluate management's performance in achieving compliance with controlling laws, administrative rules, and other guidelines; the economic, efficient, and effective operation of State government; the relevance and reliability of records and reports; and the safeguarding of assets.
- To identify statutory and fiscal changes that may be recommended to the Legislature pursuant to Section 11.45(7)(h), Florida Statutes.

In conducting our audit we:

- Obtained an understanding of selected IT controls, assessed the risks of those controls, evaluated whether selected general and application IT controls were in place, and tested the effectiveness of the controls.
- Obtained an understanding of selected internal controls and evaluated the effectiveness of selected processes and procedures related to areas within the scope of the audit by:
  - Interviewing selected Department personnel.
  - Observing Department processes.
  - Examining Department documentation and records.

- Reconciled functional areas that are funded through the Insurance Regulatory Trust Fund to the statutory authority to receive such funding.
- Prepared an analysis of the Insurance Regulatory Trust Fund by fiscal year and functional areas that compared for each of the Fund's functional areas, total assets, liabilities, beginning fund balance, revenues, expenditures, and ending fund balance.
- Determined through inquiry with management whether the Division of Agent and Agency Services had a methodology for allocating costs to the various license and appointment types.
- Tested a sample of 40 expenditure transactions from the Insurance Regulatory Trust Fund to determine if the transaction was properly recorded as direct or indirect within the applicable budget entity.
- Performed an analysis of the Division's accounting and licensing systems to determine if the systems allowed for the identification of costs and revenues by function or license type. Obtained an understanding of the Department's process for reconciling data recorded in ALIS to data submitted by the Division's fiscal agent and the State's accounting records. Tested a daily reconciliation for accuracy and to determine whether unreconciled items were properly resolved.
- Tested 60 initial license applications judgmentally selected from initial license applications received during the period July 2009 through February 2011 and recorded in ALIS, to determine whether the Department collected the proper fees, timely reviewed each application, adequately verified the eligibility of applicants, and administered a background check.
- Tested 60 initial licensee appointments judgmentally selected from initial licensee appointments received during the period July 2009 through February 2011 recorded in ALIS, to determine whether the Department collected the proper fees, correctly recorded and maintained corresponding data, and followed related policies and procedures.
- Tested 60 licensee appointments renewed during the period July 2009 through February 2011 judgmentally selected from renewed licensee appointments recorded in ALIS to determine whether the Department collected the proper fees, verified compliance with continuing education requirements, and followed related policies and procedures.
- Judgmentally selected 120 investigations (60 information-only cases and 60 closed investigations) from the Bureau of Agent and Agency Services Investigation Tracking System to determine whether ALIS data was consistent with relevant supporting documentation.
- Compared 60 licensee records to the related investigative records to determine whether the licensee records were accurate.
- Compared 60 investigative records to the related ALIS licensee records to determine whether the results of investigations had been properly recorded.
- Performed various other procedures, including analytical procedures, as necessary, to accomplish the objectives of the audit.

**AUTHORITY**

Section 11.45, Florida Statutes, requires that the Auditor General conduct an operational audit of each State agency. Pursuant to the provisions of Section 11.45, Florida Statutes, I have directed that this report be prepared to present the results of our operational audit.



David W. Martin, CPA  
Auditor General

**MANAGEMENT'S RESPONSE**

In a response letter dated November 14, 2011, the Chief Financial Officer concurred with our audit findings and recommendations. The Chief Financial Officer's response is included as **EXHIBIT B**.

**EXHIBIT A**  
**INSURANCE REGULATORY TRUST FUND**  
**SCHEDULE OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCES**  
**2009-10 FISCAL YEAR**

		Department of Financial Services					OIR		
		DFS Administration and Other (1)	State Fire Marshal	Insurance Company Rehabilitation & Liquidation	Agent & Agency Services	Insurance Fraud	Consumer Assistance	Office of Insurance Regulation	Fund Total
<b>Fund Balance at July 1, 2009</b>									<b>107,784,677</b>
<b>Revenues and Transfers-In</b>	Taxes	-	-	-	-	6,793,056	-	978,635	<b>7,771,691</b>
	License and Permit Fees	-	1,494,570	-	368,890	-	-	1,577,150	<b>3,440,610</b>
	Fees, Charges, Commissions & Sales	-	8,604,630	-	49,847,211	3,731	430,558	8,323,551	<b>67,209,681</b>
	Interest and Dividends	1,908,981	239	-	160,712	-	272,058	6,791	<b>2,348,781</b>
	Fines	-	77,007	-	1,809,015	622,975	-	2,876,381	<b>5,385,378</b>
	Refunds	791,260	25,187	338,652	1,690	9,421	4,604	4,782	<b>1,175,596</b>
	Federal Funds	-	2,473,111	-	-	-	-	-	<b>2,473,111</b>
	<b>Total Revenues</b>	<b>2,700,241</b>	<b>12,674,744</b>	<b>338,652</b>	<b>52,187,518</b>	<b>7,429,183</b>	<b>707,220</b>	<b>13,767,290</b>	<b>89,804,848</b>
	Transfers within Department	-	-	-	-	4,500,000	-	-	<b>4,500,000</b>
	General Revenue Transfers	5,000,000	-	-	-	-	-	-	<b>5,000,000</b>
Transfers from other Agencies	-	29,280,489	46	60	20,897	58	80	<b>29,301,630</b>	
<b>Total Revenues and Transfers-In</b>	<b>5,000,000</b>	<b>29,280,489</b>	<b>46</b>	<b>60</b>	<b>4,520,897</b>	<b>58</b>	<b>80</b>	<b>38,801,630</b>	
<b>Total Revenues</b>	<b>7,700,241</b>	<b>41,955,233</b>	<b>338,698</b>	<b>52,187,578</b>	<b>11,950,080</b>	<b>707,278</b>	<b>13,767,370</b>	<b>128,606,478</b>	
<b>Expenditures and Transfers-Out</b>	Salaries, Wages, & Benefits	812,055	15,129,307	588,311	7,465,145	12,212,808	6,399,175	19,014,598	<b>61,621,399</b>
	Contracted Services	(646,284)	1,298,864	57,985	1,999,749	131,007	592,991	5,007,529	<b>8,441,841</b>
	Rental - Office Space	18,575	1,239,242	-	877,415	1,132,149	674,733	1,059,571	<b>5,001,685</b>
	Other Current Expenditures	4,342,553	3,734,674	411,996	917,815	1,377,249	1,364,081	1,318,800	<b>13,467,168</b>
	Operating Capital Outlay	373,948	1,368,254	2,338	14,225	228,113	12,444	6,153	<b>2,005,475</b>
	Principal Retirement	5,112,091	-	-	-	-	-	-	<b>5,112,091</b>
	Interest and Fiscal Charges	145,747	-	-	-	-	-	-	<b>145,747</b>
	<b>Total Operating Expenditures</b>	<b>10,158,685</b>	<b>22,770,341</b>	<b>1,060,630</b>	<b>11,274,349</b>	<b>15,081,326</b>	<b>9,043,424</b>	<b>26,406,651</b>	<b>95,795,406</b>
	Transfers within Agency	374,216	4,489,344	187,324	5,439,910	2,342,669	2,139,430	2,963,207	<b>17,936,100</b>
	General Revenue Transfers Out	13,726,427	2,169,390	-	4,311,350	603,035	28,643	1,185,880	<b>22,024,725</b>
Transfers out to Other Agencies	3,879	122,730	3,477	95,170	1,130,529	83,479	151,733	<b>1,590,997</b>	
<b>Total Expenditures and Transfers-Out</b>	<b>14,104,522</b>	<b>6,781,464</b>	<b>190,801</b>	<b>9,846,430</b>	<b>4,076,233</b>	<b>2,251,552</b>	<b>4,300,820</b>	<b>41,551,822</b>	
<b>Total Expenditures</b>	<b>24,263,207</b>	<b>29,551,805</b>	<b>1,251,431</b>	<b>21,120,779</b>	<b>19,157,559</b>	<b>11,294,976</b>	<b>30,707,471</b>	<b>137,347,228</b>	
<b>Excess/(Deficiency)</b>	<b>(16,562,966)</b>	<b>12,403,428</b>	<b>(912,733)</b>	<b>31,066,799</b>	<b>(7,207,479)</b>	<b>(10,587,698)</b>	<b>(16,940,101)</b>	<b>(8,740,750)</b>	
<b>Fund Balance at June 30, 2010</b>									<b>99,043,927</b>

Source: Department Accounting Records

(1) DFS Administration and Other	Executive Director & Support Services Legal Services Information Technology Consumer Advocate Funeral & Cemetery Services State Accounting Systems
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**EXHIBIT B  
MANAGEMENT'S RESPONSE**



CHIEF FINANCIAL OFFICER  
**JEFF ATWATER**  
STATE OF FLORIDA

November 14, 2011

Mr. David W. Martin  
Auditor General  
111 West Madison Street  
Tallahassee, Florida 32399-1450

Dear Mr. Martin:

Pursuant to Section 11.45(4)(d), Florida Statutes, the enclosed response is provided for the preliminary and tentative audit findings included in the Auditor General's operational audit of the *Department of Financial Services, Division of Agent and Agency Services*.

If you have any questions concerning this response, please contact Ned Luczynski, Inspector General, at (850) 413-4960.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff Atwater".

Jeff Atwater

JA:sll

Enclosure

**EXHIBIT B**  
**MANAGEMENT'S RESPONSE (CONTINUED)**

**DEPARTMENT OF FINANCIAL SERVICES**

**OPERATIONAL AUDIT OF THE  
DEPARTMENT OF FINANCIAL SERVICES  
DIVISION OF AGENT AND AGENCY SERVICES**

**Finding No. 1: Regulatory Costs and Revenues**

The Department had not prepared detailed analyses comparing particular categories of regulatory costs to the revenues designated to cover those costs.

**Recommendation:** We recommend the Department conduct periodic comparisons of the costs of industry regulation and the associated designated fees and taxes. Any indicated need for changes in rates should be brought to the Legislature's attention.

**Response:** We concur. Beginning with the second quarter of Fiscal Year 2010-11, the Department began providing Legislative staff with a quarterly Trust Fund Analysis Report of Insurance Regulatory Trust Fund (IRTF) revenues collected and associated expenses, by regulatory function. The analysis compares current revenues and expenditures with estimated revenues and expenditures by function, and current revenues and expenditures to prior year revenues and expenditures.

While the balance in the IRTF has fluctuated over time, we expect fund revenues to remain fairly constant in the near future. As of July 1, 2011, the IRTF had a total expendable fund balance of approximately \$90 million. [Note: per Section 766.314(5)(b), Florida Statutes, the IRTF has an additional \$20 million reserve requirement for the Florida Birth-Related Neurological Injury Compensation Association.] The Legislative Budget Request for Fiscal Year 2012-13 projects that total revenue collected in Fiscal Year 2011-12 will match the IRTF's total fiscal year expenses. We will continue to provide Legislative staff with quarterly analyses of IRTF revenues and expenses, and if the need for a change in rates is indicated, the Department will bring this information to the Legislature's attention.

**Finding No. 2: Information Technology Oversight**

The Division had not provided for adequate oversight of the information technology controls relevant to the system used to support Division licensing functions.

**Recommendation:** Because of the critical nature of the data maintained by ALIS, we recommend that the Division amend the information technology services contract and that the Department make or obtain an independent periodic assessment of the contractor's relevant internal controls.

**Response:** We concur. On July 1, 2011, the Department entered into a new agreement with the contractor. The new contract included provisions requiring the contractor to adhere to the Division of Information Systems' (DIS) formal Change Management Process, which includes DIS's official Information Systems Development Methodology, use of a change tracking tool, and adherence to DIS policies, procedures, and standards for information technology functions within the Department. These requirements provide the framework for the Department's control and review over information technology services provided by contract. Also, DIS will take steps to implement additional monitoring controls to ensure the integrity, reliability, and security of ALIS data.

**EXHIBIT B**  
**MANAGEMENT'S RESPONSE (CONTINUED)**

**Finding No. 3: Appointment Fees**

The Department had not properly assessed and collected certain required fees.

**Recommendation:** We recommend that the Department continue its efforts to implement procedures to assess and collect all required fees.

**Response:** We concur. Significant information technology issues have caused delay in collecting certain fees. However, the Department is committed to ensuring these fees are collected, and the necessary information system modifications are currently underway. We anticipate these modifications will be completed by January 2012.

**Finding No. 4: Timeliness of Investigations**

A significant number of investigations were not closed within Department-established time frames.

**Recommendation:** We recommend the Bureau take steps to improve the timeliness of investigations.

**Response:** We concur. Instituting rigorous standards encourages staff to excel in their work and to identify ways to improve business processes. Bureau of Investigation (Bureau) management felt that establishing easily attainable standards would create a stagnant environment which could discourage performance and process improvements. Management developed the existing standards with the understanding that a percentage of cases would fall outside established timelines. Bureau investigators frequently encounter significant delays in obtaining information from external parties, such as banks and insurers. However, the Bureau's standards reflect investigative time, only, and do not include a factor for response time. Because the number of days taken to complete an investigation includes the response time of external entities, many cases are not closed within established standards.

The Bureau is committed to maintaining rigorous standards and will be addressing the performance of those employees with cases outside established guidelines as part of the annual performance review process. Bureau management will review the appropriateness of existing standards in light of current staffing levels and caseloads, and will explore ways to calculate the amount of actual investigatory time spent on cases. The Bureau will also evaluate established business processes to identify actions that can be taken to reduce the overall length of time necessary to properly complete an investigation.