



Memorandum



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To: John H. Copeland III, Chairperson, Public Health Trust
Eneida O Roldan , M.D., President & CEO, Jackson Health System

From: Christopher Mazzella, Inspector General

Date: December 9, 2010

Subject: Private Web Portal (Sharepoint Site) For PHT Board Members, Ref. IG10-62

By way of this memorandum, the Office of the Inspector General (OIG) expresses its concern over a recently implemented SharePoint Team site whose access is restricted to PHT Board Members and select Jackson Health System (JHS) employees. Our concern is two-fold. First, while JHS is posting public content documents, i.e. PHT Board Agendas and Agenda Items, on this shared access site, these documents are not otherwise being made electronically available to the public. Second, the SharePoint Team site has the capability for newsgroup style discussions through a "Team Discussion" application. The existence of this functionality alone, on a restricted access website, is perceptually dangerous as it could lead to Florida Sunshine Law violations.

BACKGROUND

The OIG has confirmed, via an actual web visit, that JHS is operating and maintaining a SharePoint Team site. To our knowledge, the web portal idea was first discussed during the PHT's Information Systems Committee meeting in June 2010 as a means of providing timely and relevant agenda information to Board Members. Examples of documents that would be available include, but are not limited to: meeting agenda, agenda updates, proposed contracts, etc. This idea was implemented via Microsoft's SharePoint. The current operational status of the web portal and its contents is supported by three separate references in the October 2010 Purchasing Subcommittee Report which stated:

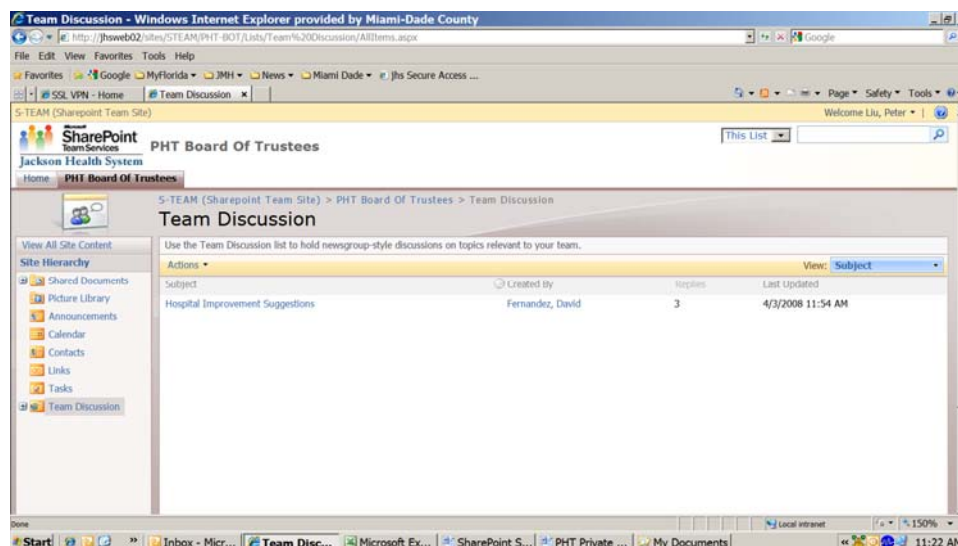
Each proposed contract may be viewed electronically at the Jackson web portal for PHT Board Members. Hard copies are available on request at the October PHT committee and Board meetings.

OIG CONCERNS

We note that there is, at present, no opportunity for the general public to access or obtain such public documents prior to the meeting during which they are scheduled to be discussed. At present, one must either request a copy of the agenda in advance of the meeting or hope that "extra copies" of the agenda and its attachments are available at the meeting. Given that the agenda and agenda items are being posted on the intranet site for access by PHT Board Members, we strongly urge that similar access to

the agenda be given to the public generally. We believe that the public interest would be better served if the agendas were accessible—by all—through JHS’s existing website www.jhsmiami.org. Further, the cost of posting these documents to the webpage will be minimal, since resources are already being used to update the calendar of events/meetings on the www.jhsmiami.org website.

Secondly, our recent visit to the PHT SharePoint site revealed the capabilities for newsgroup style discussions, e.g. a “chat room,” through a Team Discussion application. This capability is illustrated in the following screen print, shown below.



While our visit to the webpage showed that the Team Discussion functionality was still in the testing phase, we are concerned, nevertheless, that the existence of this function alone may negatively impact on-going efforts of increased transparency and raise Florida Sunshine Law issues. Thus, we believe that such a restricted access webpage for PHT Board Members is not in the PHT’s best interest.

RECOMMENDATIONS

We recommend that: 1) PHT agendas and agenda items be made accessible to PHT Board Members, JHS staff and the public through the same web-based vehicle; and, 2) that virtual or electronic “chat rooms” for PHT Board Member discussions be disabled and deleted.

OIG Contract Oversight Specialist Peter Liu will follow-up with JHS on this matter. In the meantime, as always, please do not hesitate to contact me should you have any questions or comments.

Cc: Eugene Shy, Assistant County Attorney
Alina Hudak, Assistant County Manager
Fernando Martinez, Chief Information Officer, Jackson Health System