



State Affairs Committee

Wednesday, September 21, 2011

9:00 AM

Morris Hall (17 HOB)

Committee Meeting Notice

HOUSE OF REPRESENTATIVES

State Affairs Committee

Start Date and Time: Wednesday, September 21, 2011 09:00 am

End Date and Time: Wednesday, September 21, 2011 10:30 am

Location: Morris Hall (17 HOB)

Duration: 1.50 hrs

Update on the Transfer of Florida's School Nutrition Programs to the Department of Agriculture & Consumer Services

Update on the Florida Department of Environmental Protection's Development of Numeric Nutrient Criteria

NOTICE FINALIZED on 09/14/2011 16:04 by Love.John

FLORIDA DEPARTMENT OF EDUCATION



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Gerard Robinson
Commissioner of Education



September 19, 2011

Mr. Donald E. Arnette, Regional Administrator
United States Department of Agriculture
Food and Nutrition Service
Southeast Regional Office
61 Forsyth Street, S.W., Room 8T36
Atlanta, GA 30303

Dear Mr. Arnette:

This letter is in response to your letter dated August 22, 2011, wherein you had some questions regarding our request for approval of a waiver allowing the Department of Education (FDOE) to transfer the administration of Child Nutrition Programs to the Florida Department of Agriculture and Consumer Services (FDACS). We are committed to working with FDACS to ensure a flawless transition. Staff from FDOE and FDACS who meet on a regular basis have jointly prepared the following response.

1. Implementation Plan and Timeline, Part G: Below is a description of the state's plan for implementing the program change envisioned under the waiver. An implementation timeline is attached.

Contingent upon the approval of the waiver request, the transfer of the administration and operation of the Child Nutrition Programs to FDACS will occur on January 1, 2012. Sufficient leadership and resources are available in both FDACS and FDOE to ensure such a transition. The two agencies have formed a transition team to coordinate their efforts and to ensure the uninterrupted administration of the Child Nutrition Programs. The team consists of professional staff in program operations, information technology, budget, finance, policy, and marketing. The transition team has developed a detailed and comprehensive implementation plan that provides for a seamless transition of staff, administrative responsibilities, information technology, and property.

Program Operations – All staff currently employed by FDOE to administer the Child Nutrition Programs will be transferred to FDACS and will continue performing their responsibilities of program administration and operation. The transfer will not impact the state's performance of required functions.

Information Technology and Facilities

- The Holland Building has been chosen to house Child Nutrition Program staff.
- An assessment of network cabling and infrastructure requirements has been completed.
- The Child Nutrition Program staff will use FDACS's Siemens phone system so as to be integrated with other agency staff.
- The Agriculture Management Information Center (AGMIC) has assessed and identified the server hardware and software needed to support the application used by the Child Nutrition Program staff. This hardware/software will be purchased and installed by September 30, 2011.
- The database platform in use by the Child Nutrition Program staff at FDOE is Microsoft SQL Server. AGMIC will train staff from September 1, 2011, through October 28, 2011, to fully support the infrastructure requirements of the program area.
- The installation of network cabling, network infrastructure, and phone systems infrastructure at the Holland Building will begin no later than October 14, 2011, in preparation for the move of staff.
- The installation of network hardware for the back-end database server and front-end web server also will begin no later than October 14, 2011. AGMIC staff will obtain backup media of the Child Nutrition Program system from FDOE, to be installed upon completion of the installation of necessary hardware/software infrastructure.
- AGMIC staff will obtain the most current list of Child Nutrition Program employees and create the necessary user and e-mail accounts/profiles on the FDACS network by November 15, 2011. Testing of the Child Nutrition Program database on the FDACS network will begin by November 1, 2011, and be completed by November 10, 2011. Staff will begin the move over a weekend in early December and AGMIC will obtain the most current database backup of the Child Nutrition Program system, and import all user e-mail to the new e-mail inboxes.
- No later than December 16, 2011, AGMIC will work with Child Nutrition Program staff to acclimate users to the network and Help Desk and to ensure the systems are performing well.

Budget

- A budget amendment to transfer the Child Nutrition Programs to FDACS will be processed in November 2011 and become effective on January 1, 2012.
- There will be no federal costs associated with the transfer.

Finance and Accounting

- FDACS staff will create the accounting structure for the Child Nutrition Programs by October 31, 2011.
- As it relates to the transfer of the current agreements and/or contracts with outside agencies and in order to ensure that all such transfers will be in effect by the January 1, 2012, transition date, staff from FDACS and FDOE will begin the transfer of all relevant grants, contracts, and purchase orders to FDACS, pursuant to the transfer authority granted by Section 3, Chapter 2011-217, Laws of Florida, beginning upon receipt of the waiver. Documents will be stored in the FDACS Administrative Image Management System.
- Grant reconciliations as of September 30, 2011, will begin in October and continue into January 2012 for final close-out. The FDOE Comptroller will file federal financial reports for activity through December 31, 2011. FDACS Finance and Accounting, in coordination with staff from the FDACS Nutrition Office, will begin federal reporting as of January 31, 2012.
- The FDACS Grants Management Section will submit quarterly federal financial reports. The Grants Management Section currently files FNS 667 for the Emergency Food Assistance Program (TEFAP) and requests drawdowns through the Department of Treasury's Automated Standard Application Payments System. There will be no delay in filing the quarterly federal financial reports.
- Payments to sponsors will be processed through the FDACS Disbursements System. There will be no delay in payment to the sponsors during or after the transfer of the program.

2. Federal Costs Associated with the Transfer: None of the costs associated with the transfer will be paid with Federal State Administrative Expense Funds.

3. Improvement of Services, Part E: The FDACS has the authority to enter into agreements with schools and institutions. In fact, the FDACS currently enters into agreements with schools and institutions wishing to participate in the Food Distribution Program and receive U.S. Department of Agriculture foods pursuant to the National School Lunch Program (NSLP).

Unlike TEFAP, the NSLP, School Breakfast Program, and the Summer Food Service Program are entitlement programs. Participation is not determined by the amount of available funds. Any eligible public or private non-profit school or institution may participate. Since participation is not limited or affected by funding, there would be no reason for FDOACS to consider competitively procuring participants for the Child Nutrition Programs.

The transfer of the Child Nutrition Programs will enhance the program's efficiency and effectiveness, given the close alignment of the FDACS's core mission with the goals of the Child Nutrition Programs. The January 1, 2012, transfer date allows sufficient time for planning and

Mr. Donald Arnette
September 19, 2011
Page 4

implementation and allows for the State of Florida to realize the benefits from the transition as soon as possible. Under the current budget and accounting framework at FDOE and FDACS, the transfer is as easily administered on January 1, as at the end of a fiscal year. Delaying the transfer will only delay the benefits to Florida's children. The transfer of the Child Nutrition Programs from FDOE to FDACS is a top priority for both agencies, and both agencies are assured that the transfer will be implemented effectively and smoothly. If you have any questions, please do not hesitate to contact Mark Eggers at (850) 245-0405 or by e-mail at mark.eggers@fldoe.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerard Robinson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Gerard Robinson
Commissioner

cc: The Honorable Adam H. Putnam, Florida Commissioner of Agriculture



United States
Department of
Agriculture

August 22, 2011

Food and
Nutrition
Service

Southeast Region

61 Forsyth St. S.W.
Room 8T36
Atlanta, GA
30303-3415

Mr. Gerard Robinson, Commissioner
State Department of Education
325 W. Gaines Street, Suite 1514
Tallahassee, Florida 32399-0400

Dear Mr. Robinson:

This is in regard to a letter sent to my office dated July 15, 2011, from Commissioner John L. Winn, requesting approval of a waiver in order to transfer the administration of the Child Nutrition Programs from the Florida Department of Education (FL DOE) to the Florida Department of Agriculture and Consumer Services (FL DACS). (*See enclosed letter*). The waiver application was submitted with regard to Section 12 of the Richard B. Russell National School Lunch Act [42 U.S.C. 1760] which requires that "state educational agencies" have an agreement with the United States Department of Agriculture that affirms the administrative responsibilities for these programs.

Our primary concern is the effective and efficient administration of our programs, and we are committed to working with FL DOE and FL DACS to that end. However, in order for us to consider your waiver request, we are requesting the following additional information and/or clarification:

1. Implementation Plan and Timeline, Part G -- As the implementation plan is the tool that moves from the strategic planning phase to the action phase, it is critical that the plan provide additional information outlining details relating to the transfer of the program beyond establishing a transition team and an effective date of January 1, 2012. In general terms, the plan should contain clearly outlined expectations, goals, assignments of duties, and a related timeline for these activities. Therefore, please include additional information in the State's implementation plan that will address these specific elements as they relate to plans to move the claims payment system, the accounting/reporting function currently in the State's accounting division, and the transfer of the current agreements and/or contracts with outside agencies such as the Florida Department of Children and Families (Direct Certification Program), and State Universities (Team Nutrition Grant, Training and the Resource Library). With respect to the timeline, additional detail on whether all functions will transfer on January 1, 2012, or whether the transfer will occur in phases will help us ensure that the transition occurs smoothly and without interruption to program services. If in phases, please describe the sequence of the transfers.
2. Federal Costs Associated with the Transfer -- The State's cover letter indicates the transfer will not increase Federal costs (a requirement for the waiver to be approved), but Part H of the waiver application indicates, "there will be some non-recurring costs which will be paid for with Federal State Administrative Expenses

funds." Please provide more details on the types of non-recurring costs and estimated amounts of Federal funds anticipated. Also, identify any new recurring costs that are being considered such as salaries/benefits for staff currently paid for with non-Federal funds.

3. Improvement of Services, Part E -- Based on our knowledge of the administration of The Emergency Food Assistance Program (TEFAP), FL DACS is required to enter into contracts after issuing competitive bids for the administration of the program. FL DACS is not allowed to enter into agreements with TEFAP agencies. Federal regulations 7 CFR Part 210.9 for the National School Lunch Program and 7 CFR Part 225.6 for the Summer Food Service Program stipulate that State agencies enter into agreements with schools and institutions. Please provide assurance that FL DACS has the authority to sign agreements with eligible schools and institutions and would not require contracts or competitive bids in order to participate in the respective programs.

Finally, we would like to better understand your decision to transfer the programs in the middle of a Federal fiscal year. Paying claims is a complex process that requires close coordination between the program and accounting staff. The program authorizes claims reported by the School Food Authority for payment and accounting pays the claims and draws the funds to pay them from the Federal Letter of Credit. This requires monthly reconciliations and reporting by both program and accounting, since the State's entitlement is based on the lesser of meals reported multiplied by the appropriate rate or payments made by the accounting system. Transferring the programs in the middle of a Federal fiscal year will likely further complicate the reconciliation process for the State as multiple staff, records and payment systems will be involved in the determination of the State's final entitlement.

I look forward to your response. If you need additional information or would like to meet with me and/or my staff, please contact me directly at (404) 562-1801, or Lanna Kirk, Regional Director of the Special Nutrition Programs at (404) 562-7072.



DONALD E. ARNETTE
Regional Administrator

Enclosure

cc: Adam H. Putnam, Commissioner, FL DACS
Mark Eggers, Administrator, FL DOE, Food and Nutrition Management

FLORIDA DEPARTMENT OF EDUCATION



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John L. Winn
Commissioner of Education



July 15, 2011

Mr. Donald Arnette, Regional Administrator
United States Department of Agriculture
Food and Nutrition Service
Southeast Regional Office
61 Forsythe Street, S.W., Room 8T36
Atlanta, Georgia 30303

Dear Mr. Arnette:

On June 23, 2011, Senate Bill 1312 was approved by Governor Rick Scott transferring the administration of child nutrition programs from the Florida Department of Education to the Florida Department of Agriculture and Consumer Services (FDACS), pending approval of a waiver of 42 U.S.C. §1760(1) by the United States Department of Agriculture.

The State of Florida requests a waiver of the requirement that the state educational agency administer the United States Department of Agriculture's child nutrition programs. The specific programs are the National School Lunch Program and Afterschool Snack Program (7 C.F.R. §210.3(b)), School Breakfast Program (7 C.F.R. §220.3(b)), Special Milk Program (7 C.F.R. §215.3(b)), Seamless Summer Option and Summer Food Service Program (7 C.F.R. §225.3(b)), Fresh Fruit and Vegetable Program (Section 19 of the 2008 U.S. Farm Bill), and State Administrative Expense Funds (7 C.F.R. §235). Approval of the waiver by November 1, 2011, will result in the transfer of the child nutrition programs on January 1, 2012.

The Florida Department of Education and the FDACS have reviewed the impact of the requested transfer. The agencies concluded that the transfer would enhance the programs' efficiency and effectiveness, given the close alignment of the FDACS's core mission with the goals of the child nutrition programs. The transfer will not increase federal costs, nor will it have any adverse effect on the provisions enumerated in 42 U.S.C. §1760(1)(4).

Mr. Donald Arnette, Regional Administrator
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The FDACS has ongoing programs in food production, farm-to-school initiatives, nutrition education, and promotion of nutritious meals in schools. With the agency's experience and leadership in the food industry, it is ideally positioned to administer the state's child nutrition programs.

I am requesting approval of the enclosed "Application of Waiver" to facilitate an efficient transfer of the respective child nutrition programs to FDACS without interruption of program services. If there are questions, please contact Mark Eggers at (850) 245-0405 or by e-mail at Mark.Eggers@fldoe.org.

Sincerely,

A handwritten signature in black ink, appearing to read "John L. Winn", with a long horizontal flourish extending to the right.

John L. Winn
Commissioner

cc: The Honorable Adam H. Putnam, Florida Commissioner of Agriculture

APPLICATION FOR WAIVER
Florida Department of Education, State of Florida

Part A: Identification of the state agency, the child nutrition programs in which it participates, and a general description of the size and scope of its program.

The Florida Department of Education (FDOE), Food and Nutrition Management Section, currently administers seven child nutrition programs. These seven programs include National School Lunch Program (NSLP), School Breakfast Program (SBP), Fresh Fruit and Vegetable Program (FFVP), Summer Food Service Program (SFSP), Seamless Summer Option (SSO), Afterschool Snack Program (ASSP) and Special Milk Program (SMP). The programs are administered by 45.5 staff members who are exclusively supported by federal funds. Responsibilities include developing, disseminating, evaluating, and approving all program documents required for participation; providing technical assistance to school districts in the areas of implementation, facilities improvement, food service methods, and overall program effectiveness; on-site monitoring of programs for compliance with state and federal regulations; and providing guidance in the financial administration of these programs.

State and federal reimbursements are paid to sponsors of the child nutrition programs to offset the cost of meals. All meals served to children are subsidized by state and federal funds. The rate of federal reimbursement is based on income eligibility. In fiscal year (FY) 2010, \$9,239,651 in state matching funds and \$769,258,911 in federal funds were provided to support these child nutrition programs.

Below is program information for FY 2010.

PROGRAM	MEALS/SUPPLEMENTS SERVED FY 2010	FEDERAL FUNDS RECEIVED FY 2010
National School Lunch Program	273,646,288	\$564,213,172
School Breakfast Program	109,736,423	\$160,767,483
Afterschool Snack Program	15,240,598	\$10,944,662
Special Milk Program	184,815	\$31,621
Summer Food Service Program	9,618,472	\$22,771,701
Seamless Summer Option	765,118	\$1,744,348
Fresh Fruit and Vegetable Program	N/A	\$2,812,253

Part B: Identification/description of the specific statutory or regulatory requirements for which the waiver is being sought, including the applicable citations of the National School Lunch Act.

The U.S. Secretary of Agriculture is given authority to waive certain statutory requirements under the National School Lunch Act or the Child Nutrition Act of 1966 (now the Richard B. Russell National School Lunch Act) or any regulation issued under either such act as provided for in Section 12(1) of the National School Lunch Act. FDOE, through the Commissioner of Education, is requesting a waiver of any and all

applicable statutory and regulatory requirements limiting state-level administration of the National School Lunch Program and Afterschool Snack Program (7 C.F.R. 210.3(b)), School Breakfast Program (7 C.F.R. 220.3(b)), Special Milk Program (7 C.F.R. 215.3(b)), Seamless Summer Option and Summer Food Service Program (7 C.F.R. 225.3(b)), Fresh Fruit and Vegetable Program (Section 19 of the 2008 U.S. Farm Bill), and the State Administrative Expense Funds (7 CFR 235) to the state educational agency. FDOE, through the Commissioner, is recommending the transfer of all seven nutrition programs and the transfer of the state administrative responsibility for the Child Nutrition Programs to the Florida Department of Agriculture and Consumer Services (FDACS). FDOE consulted with the Food and Nutrition Service Southeast Regional Office in the preparation of this waiver.

Part C: Description of the impediments to the efficient operation and administration of the program that caused the waiver to be sought.

FDACS has reviewed the delivery of child nutrition programs currently administered by FDOE for consistency and compatibility with the primary mission of the agencies that administer the programs. FDACS manages ongoing programs in the areas of food production, farm to school initiatives, nutrition education and, specifically, in the area of promoting healthy, nutritious meals to school children and others. In addition, the proposed transfer will make available marketing and nutrition-related resources. With the agency's experience and leadership in the food industry, FDACS is ideally positioned to administer the state's child nutrition programs. FDACS is prepared to provide administrative oversight of the respective child nutrition programs and has an established effective working relationship with the United States Department of Agriculture (USDA). FDACS currently manages the Commodity Food Distribution Program, the Disaster Feeding Program, and the Emergency Food Assistance Program, making it familiar with USDA's program operations and the administration of USDA contracts.

Part D: Description of actions that the state has undertaken to remove any state-level barriers (either statutory or regulatory) to achieve the result sought under the waiver. (if applicable)

With the Governor's favorable approval of Senate Bill 1312, the "Healthy Schools for Healthy Lives Act," there are no existing state-level statutory or regulatory barriers related to the transfer. FDOE and FDACS will work together to ensure the uninterrupted operation of the child nutrition programs and continued coordination of efforts between the two departments in the proper implementation of all federal requirements. It is a type two transfer, which means that all staff members, property, and responsibilities would be transferred to FDACS. Staff would continue working in their current positions under FDACS' management and control. FDOE and FDACS would coordinate the sharing of information and other resources for effective program management.

Part E: Description of the State's expectation as to how the waiver will improve services and the expected outcomes if the waiver is granted.

AND

Part F: A description of the management goals to be achieved under the proposed waiver (e.g., specific saving of time, fewer personnel required to administer the program, etc.)

The transfer of the child nutrition programs from FDOE to FDACS will benefit the State of Florida as well as local programs, while maintaining consistency with the congressional intent of the programs. The nutrition and marketing programs within FDACS, which are devoted to promoting healthy foods for children, will increase the quality and efficiency of program operations and client services. FDACS's emphasis on child nutrition and healthy meals will help it build healthy eating habits among children, decreasing the prevalence of childhood obesity and establishing a strong foundation for a lifetime of healthy eating.

Transferring the programs to FDACS can provide the following expected outcomes, which are goals to be achieved under the proposed waiver:

- Increase emphasis on the nutrition goals of the programs, promote the dietary guidelines, and foster a better nutrition environment in schools;
- Improve administrative efficiency and effectiveness by coordinating the administration of child nutrition programs under one state agency;
- Establish a cooperative relationship between school food programs and the state's agricultural sector resulting in benefits that could reduce food costs to schools and improve the economy of the state's agricultural industry;
- Improve promotion of the consumption of fresh fruits and vegetables; and
- Improve the efficiency and effectiveness of the child nutrition programs as a result of aligning the goals of child nutrition programs with the FDACS's core mission.

Part G: A description of the state's plan for implementing the program change envisioned under the waiver, including a timeline for implementation.

Contingent upon the approval of the waiver request, the transfer of the administration of the child nutrition programs to FDACS will occur on January 1, 2012. Sufficient leadership and resources are available in both agencies to ensure such a transition. FDACS and FDOE have formed a transition team to coordinate the efforts of the two agencies and to ensure the uninterrupted administration of the respective child nutrition programs. The team consists of professional staff in program operations, information technology, budget, finance, policy, and marketing. The transition team will develop a detailed and comprehensive implementation plan that provides for a seamless transition of staff, administrative responsibilities, information technology, and property. The staff currently employed by FDOE will be administratively transferred to FDACS and will continue performing their responsibilities of program administration and operation services. The transfer will not impact the state's performance of required functions.

Part H: A description of the funding sources to be used to offset any additional cost resulting from the implementation of the waiver (if applicable)

As a result of the proposed transfer of the child nutrition programs to FDACS, there will be some non-recurring costs, which will be paid for with federal State Administrative Expenses funds.

Part I: Description of the process used by the State to provide notice and information to the public regarding the proposed waiver.

Prior to FDOE's request for the waiver, the public has been continuously informed of the state's interest in transferring the child nutrition programs from FDOE to FDACS through the legislative process. Contingent upon approval by the USDA, Senate Bill 1312 transfers administration of the child nutrition programs from FDOE to FDACS. The bill was filed February 22, 2011, ordered enrolled on May 4, 2011, and approved by Governor Rick Scott on June 23, 2011.

Additionally, the State of Florida publishes the Florida Administrative Weekly (available at <https://www.flrules.org/Default.asp>), which is the repository for public notification relating to actions to be taken by state agencies. FDOE will publish notice, including the following information, in the next available volume of the Florida Administrative Weekly after this waiver has been submitted to the USDA for approval.

"Public Notice Announcing that the Florida Department of Education in conjunction with the Florida Department of Agriculture and Consumer Services, Intends to transfer the administration of the Federal Child Nutrition Programs (7 CFR Part 210, 7 CFR Part 220, 7 CFR Part 215, 7 CFR 225, and 7 CFR Part 235) from the Florida Department of Education to the Florida Department of Agriculture and Consumer Services. The Florida Department of Education has prepared a request for waiver of the federal requirement that child nutrition programs be administered by the state educational agency. This waiver request proposes that the Florida Department of Agriculture and Consumer Services be designated as the state agency responsible in all respects for the administration of child nutrition programs in Florida. The waiver request has been submitted to the United States Department of Agriculture in accordance with 42 U.S.C. 1760(1). An interested person or agency may address questions concerning this matter via mail, telephone, fax, or e-mail to the Florida Department of Education, Food and Nutrition Management Section, 325 West Gaines Street, Suite 1024, Tallahassee, Florida 32399; telephone 800-504-6609; fax 850-245-7855; e-mail mark.egggers@fldoe.org."

**Numeric Nutrient
Criteria**



Florida Department of Environmental Protection

Numeric Nutrient Criteria

Update Following the 2011 Legislation Session

By: Florida Department of Environmental Protection

Drew Bartlett, Director

Division of Environmental Assessment and Restoration

Prepared for: House State Affairs Committee

September 21, 2011

Chair: Representative Seth McKeel



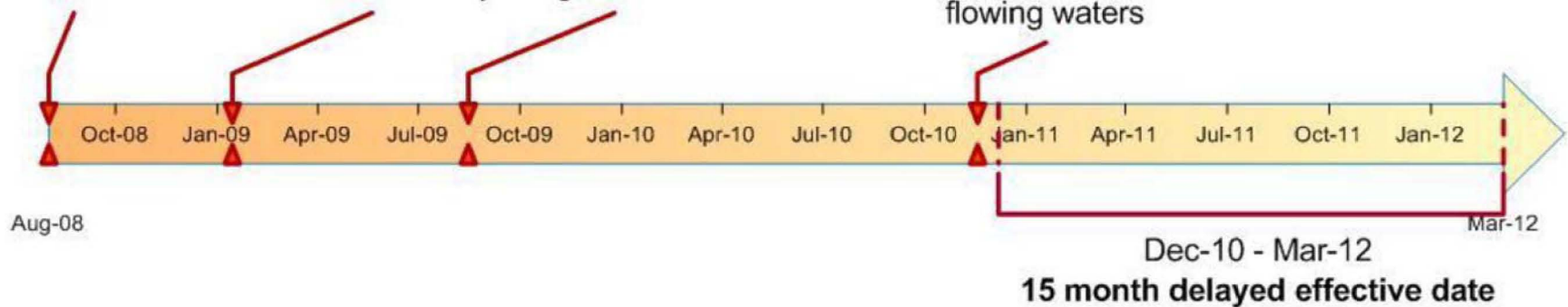
Timeline: EPA Numeric Nutrient Criteria

August 2008
EarthJustice filed suit to compel EPA to establish criteria

January 2009
EPA declares numeric nutrient criteria "necessary"

August 2009
EPA signs settlement agreement

November 2010
EPA promulgates numeric criteria for lakes & flowing waters



Marine Criteria

Proposal - November, 2011

Final - August, 2012





FDEP Filed Petition with EPA (April 22, 2011)

- FDEP Petitioned EPA based on Florida's performance of the eight key elements identified in EPA's Memo.
- Petition included initiation of rule development for state standards, and requested that EPA:



- Rescind the Determination to Promulgate Numeric Nutrient Criteria in Florida
 - Rescind Promulgated Criteria
- EPA's initial response (May 22, 2011) did not grant or deny.





Other Recent and Projected Events

- **June-Oct 2011** Holding Public Workshops to Discuss NNC Rule Concepts and Draft Rules
- **October 2011** *Decide Whether to Proceed*
 - Pending:
 - December 2011** – Present Rule to ERC
 - Legislative Session 2012** – Present Rule for Ratification
 - After Ratification** – Submit Rule to EPA





Three Principles of FDEP's Draft Rule

Give preference to nutrient TMDLs, SSACs, and WQBELs.

Only create nutrient reduction expectations where necessary to protect Florida waterbodies.

Eliminate unnecessary procedures that do not add to waterbody protection and restoration.





Questions?



For more information, please contact:

Drew Bartlett

drew.bartlett@dep.state.fl.us

(850) 245-8446

