October 15, 2015

The Honorable Jeff Atwater
Chief Financial Officer
The Capitol, PL-11
Tallahassee, Florida 32399-0301

Dear Mr. Atwater:

As required by Section 20.055, Florida Statutes, I am providing the Department’s six-month status report of corrective actions taken in response to Auditor General Report Number 2015-181, *Department of Financial Services Automated Investigation Management System (AIM)* (published April 15, 2015).

If you have any questions, please do not hesitate to contact me.

Sincerely,

[Signature]

Teresa Michael
Inspector General

TM:rlg

Attached

cc: Robert Kneip, Chief of Staff
    Kathy DuBose, Coordinator, Joint Legislative Auditing Committee
    Jay Etheridge, Deputy Chief Financial Officer
    Charles Ghini, Chief Information Officer
DEPARTMENT OF FINANCIAL SERVICES
OFFICE OF INSPECTOR GENERAL

SIX-MONTH FOLLOW-UP REPORT
STATUS OF CORRECTIVE ACTION

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Finding No. 1
Some user access privileges to AIM data and related IT resources were not limited to only what was necessary in the performance of assigned job duties and did not promote an appropriate separation of duties or provide for individual accountability.

Recommendation
The Department should limit user access to AIM data and related IT resources to only access privileges that are necessary to perform assigned job duties, promote an appropriate separation of duties, and provide for individual accountability.

Original Response
Concur. The Department will evaluate existing access and restrict it as appropriate to ensure separation of duties and accountability.

Six-Month Follow-up: September 25, 2015
Responsible Division Division of Information Systems

Reported Status
The Division of Public Assistance Fraud (PAF) terminated the test account on February 24, 2015.

The Division of Information Systems has restricted access as appropriate. DIS terminated use of the shared FTP account on May 7, 2015, and assigned the developers individual accounts for the performance of their related functions. Additionally, DIS implemented reviews of developer access in September 2015 to ensure ongoing appropriateness of access.

OIG Assessment
**Partially Complete.** The Division has taken certain action to remove inappropriate access. The OIG will continue to monitor this finding until the Department addresses access by programming staff to the PAF File Exchange Server or management accepts the risk of not implementing corrective action.
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**Finding No. 2**
The Department had not conducted periodic reviews of the appropriateness of access privileges granted to AIM users.

**Recommendation**
The Department should ensure that reviews of the appropriateness of access privileges granted to AIM users are conducted as required by AP&P 4-05 to ensure the continued appropriateness of user access privileges.

**Original Response**
Concur. Reviews of the appropriateness of access granted to AIM users will be conducted monthly and documented.

**Six-Month Follow-up:** September 25, 2015

**Responsible Division**
Division of Public Assistance Fraud

**Reported Status**
PAF implemented quarterly reviews of access privileges granted to AIM users. The first review was performed on August 7, 2015 and is documented in AIM case, PA-75-0015, Investigative Report #12.

The access roles review will be conducted quarterly in conjunction with the DAVID quarterly reviews.

**OIG Assessment**
Closed. Based on the information provided, it appears that the Division has taken corrective action to address this finding.
### SIX-MONTH FOLLOW-UP REPORT
**STATUS OF CORRECTIVE ACTION**

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<td>April 15, 2015</td>
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</tbody>
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**Finding No. 3**
Certain security controls related to user authentication, logging, and review for AIM and related IT resources needed improvement.

**Recommendation**
The Department should implement appropriate security controls related to user authentication, logging, and review to ensure the continued confidentiality, integrity, and availability of AIM data and related IT resources.

**Original Response**
The Department will continue to address security controls, as appropriate.

**Six-Month Follow-up:** September 25, 2015

**Responsible Division**
Division of Information Systems; Division of Public Assistance Fraud

**Reported Status**
The Division of Information Systems is evaluating and implementing controls where appropriate.

**Expected Completion Date for Corrective Action**
March 2016

**OIG Assessment**
Open. The OIG will continue to monitor the corrective actions taken by the Division to address this finding.