

**Florida Department of Economic Opportunity  
Reemployment Assistance Information Technology Operational Audit  
Auditor General Report No. 2015-107  
Six-Month Status of Audit Findings  
August 25, 2015**

**Finding No. 1: Application Design Documentation**

**Auditor Recommendation:** The Department should maintain current application design documentation and appropriate process flow documentation for CONNECT to ensure the confidentiality, availability, and integrity of CONNECT data.

**Original DEO Response:** DEO welcomes comments and suggestions on RA Program business processes and practices, but does not believe that these should be considered as audit findings with respect to IT functionality.

Moreover, this finding was based on a workflow document contained in the 2009 feasibility study outlining general RA processes. This 2009 feasibility study workflow document was not intended to be used to update and capture the complete workflow of the CONNECT system. Its use was limited to the feasibility study.

CONNECT uses a different method to maintain current application design and process flow documentation. Every "Use Case" created for design has a workflow diagram for the process. Use cases, workflows, and design documents are updated on a continuous basis when changes are completed for the CONNECT system. This documentation was available for the auditor to review (located in the Functional Design documents on share point during the audit). CONNECT will proceed along the correct path and/or workflow based on responses received from a user (whether staff, claimant, third party representative, or employer).

**Status:** The Auditor General responded to the explanation above by stating the following: "Although the Department's method may be effective for maintaining documentation at a detailed level (Use Case Level), it is not effective for maintaining a clear understanding of how the individual detail design Use Cases of CONNECT flow together and interrelate from an overall, high-level perspective . . . ."

DEO maintains its original position. First, due to the large size and complexity of the CONNECT system, it is not feasible to create a single flowchart of how the system could work in every scenario. For such systems, it is not industry standard to create a single flowchart. See, e.g., Jill Duffey, Editor of [PCMag](#) ("Rather than make one massive document that outlines everything, create documents that capture only one procedure. . ."). Second, DEO continues to update each Use Case with appropriate workflows, pinpointing specific issues under every process area. In this way, DEO is appropriately capturing business process flows.

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**Finding No. 2: Use of Social Security Numbers**

**Auditor Recommendation:** In the absence of establishing an imperative need for the use of SSNs, the Department should comply with State law by establishing another identifier for user IDs to be used in CONNECT rather than SSNs.

**Original DEO Response:** DEO is in compliance with Florida and federal laws applicable to the use of social security numbers (SSNs) in the CONNECT system. DEO does not agree that the use of a claimant's SSN as a user ID is contrary to law.

The SSN is the unique identifier used by states and USDOL in administering RA (UC) programs. Sections 42 USC 1320b-7(a) and (b), and section 443.091(1)(h), Florida Statutes, require the RA Program to condition eligibility for benefits on a claimant's provision of a valid SSN when filing a claim for benefits.

Section 119.071(5)(a), Florida Statutes, provides:

- 2.a. An agency may not collect an individual's social security number unless the agency has stated in writing the purpose for its collection and unless it is:
  - (I) Specifically authorized by law to do so; or
  - (II) Imperative for the performance of that agency's duties and responsibilities as prescribed by law.
- b. An agency shall identify in writing the specific federal or state law governing the collection, use, or release of social security numbers for each purpose for which the agency collects the social security number, including any authorized exceptions that apply to such collection, use, or release. Each agency shall ensure that the collection, use, or release of social security numbers complies with the specific applicable federal or state law.
- c. Social security numbers collected by an agency may not be used by that agency for any purpose other than the purpose provided in the written statement.
3. An agency collecting an individual's social security number shall provide that individual with a copy of the written statement required in subparagraph 2. The written statement also shall state whether collection of the individual's social security number is authorized or mandatory under federal or state law.
4. Each agency shall review whether its collection of social security numbers is in compliance with subparagraph 2. If the agency determines that collection of a social security number is not in compliance with subparagraph 2., the agency shall immediately discontinue the collection of social security numbers for that purpose.

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As cited above, DEO has the statutory authority to collect SSNs for use in CONNECT to process claims. Furthermore, the collection of SSNs is imperative for the performance of DEO's duties and responsibilities. And lastly, DEO has identified in writing for claimants the specific laws governing its collection, use, and release of SSNs.

The P&T finding narrative treats the use of the SSN as the claimant user ID for logging on to CONNECT to RA claim purposes separately from the use of the SSN in CONNECT for claim processing, and on this basis assumes that DEO does not have an imperative need to use the SSN as a claimant user ID, and further finds that the CONNECT Privacy Act Statement does not advise claimants of the use of and the authority for the use of the SSN as a user ID. Because the SSN is used as the unique claimant identifier in claims processing and administration, the use of the SSN as the claimant's user ID for logging on to CONNECT is subsumed within claims processing. The Privacy Act notice provided in the CONNECT system advises claimants that information provided in CONNECT is required to process a claim and that disclosure of SSN is mandatory under federal laws. The claimant user ID for logging on to CONNECT for filing claims and providing eligibility information is for the use specified in the Privacy Act notice, i.e., for processing the claimant's claim.

Two states with similar systems were contacted and confirmed that SSNs are used as claimant IDs for system access. Moreover, from 2001 – 2015, DEO's use of SSNs as a claimant log on ID has not been questioned. Indeed, the issue of compliance with section 119.071(5)(a)2.a., Florida Statutes, has been reviewed previously by the Office of Auditor General with no finding that the use of SSNs in the RA Information System as the unique identifier for claimants was in violation of section 119.071(5)(a)2, Florida Statutes or federal law. Although Auditor General Report No. 2014-041, DEO Selected Administrative Processes and Prior Audit Follow-Up, Operational Audit, contained findings on the collection of SSNs by DEO, the findings (and the specific finding details identifying the program areas) did not involve the RA program. During the operational audit, auditors requested and obtained information on the collection and use of SSNs in the administration of the RA program, the RA Program's compliance with section 119.071(5)(a), Florida Statutes, and the Privacy Act Statement used by the RA Program, including the request for SSNs when applying for benefits through the Legacy system. Information provided on the use of SSNs in the online claims application process was reviewed by the auditors and discussed with program staff during the conduct of the audit.

Despite DEO's specific authority to collect SSNs, and the unquestioned historical practice, DEO is reviewing how an alternative log-on process would affect information security and/or efficiency of claims processing.

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**Status:** DEO maintains that it is in compliance with Florida and federal laws applicable to the use of social security numbers (SSNs) in the CONNECT system. DEO is currently exploring the possibility of a unique claimant ID. Adoption of unique claimant IDs would require a large-scale change to the coding system. DEO will continue to gather information regarding time, costs, and coding to determine the feasibility of such an extensive change.

**Finding No. 3: Personally Identifiable Information**

**Auditor Recommendation:** The Department should establish IT controls to ensure the confidentiality, integrity, and availability of CONNECT data and IT resources.

**Original DEO Response:** DEO concurs that any agency that deals with personally identifying information (PII) must have security controls in place to ensure the confidentiality, integrity, and availability of data and IT resources. These are already established at DEO and the agency works continuously to improve them. Although DEO has been unable to replicate the issues that the auditors found during the audit, it has measures in place to test for these issues and will continue to test controls in the future to ensure the confidentiality, integrity, and availability of CONNECT data and IT resources. In fact, DEO has gone above and beyond to ensure that PII is protected with an advanced security team dedicated to detecting and stopping fraud, as well as establishing greater emphasis on rigorous internal staff policies.

**Status:** As stated in the original response, security controls exist and DEO works continuously to improve them. Over the last two years, DEO has explored and implemented several measures to ensure the confidentiality, integrity, and availability of RA system data and IT resources. Indeed, DEO believes it has adopted several best practices that most government agencies have yet to adopt. For example, DEO is now redacting all SSNs from employer documents and has implemented additional restrictions on the ability to view SSNs within the system. DEO staff with access to PII are forbidden to access websites not related to work, use their cell phones at their work stations, plug any portable electronic devices into their work stations, or email SSNs to external addresses. DEO is removing personal printers from RA employee workstations and monitoring employee access to the RA system to detect suspicious activity.

**Finding No. 4: Application Input Edits**

**Auditor Recommendation:** The Department should improve controls related to application input edits to ensure the accuracy of CONNECT data and to ensure compliance with U.S. DOL ET Handbook 301.

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**Original DEO Response:** DEO welcomes comments and suggestions on the business practices of the RA Program, but does not believe that these should be considered as audit findings with respect to IT functionality. DEO continuously strives to have effective input controls to ensure the accuracy of CONNECT data and compliance with U.S. DOL ET Handbook 301 and will continue to improve controls. DEO is in compliance with applicable laws and legal requirements.

In response to the examples included in the finding narrative, DEO provides the following:

The CONNECT system is designed to enter the postmark date at the time of indexing and to permit staff to edit the postmark into the system as necessary. DEO will ensure that staff training and controls are in place to ensure that postmark dates and received dates are properly sequenced in CONNECT to provide accurate processing of claims and benefit payments. DEO will explore program changes with respect to editable date fields. Currently, DEO has established business processes to ensure that dates related to claim issues and employment dates are reasonable and valid.

With reference to zip code verification, the tool used by the system, Quick Address Software (QAS), verifies only the street address when an application is completed. This tool does not include a verification of the zip code. While DEO has never had a tool to perform zip code verification and knows of no such federal requirement, DEO will explore the feasibility of adding zip code verification.

Telephone numbers are not required to apply for benefits, to process claims, or to provide official notifications. DEO cannot mandate that correct telephone numbers be provided and cannot require claimants to update telephone numbers. The telephone numbers in CONNECT are voluntarily provided by claimants. When no telephone number is provided, the system enters all nines in the digit fields. Verification of telephone numbers that have been voluntarily provided by some claimants is not required to ensure compliance with U.S. DOL ET Handbook 301.

Staff is trained and instructed to add detailed information in mandatory note fields. CONNECT requires and recognizes that an entry has been made so that users must enter a character in the mandatory fields. As with most systems, CONNECT does not have logic to recognize or analyze information typed into these fields. If proper notes are not being entered or this requirement is being bypassed, it should be discovered in management reviews and corrected as a business process.

**Status: DEO maintains its original position and continues to explore possible design changes as stated above.**

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**Finding No. 5: Inadequate Edits – Duplicate Claims and Claims Issues**

**Auditor Recommendation:** The Department should continue its efforts to ensure that controls are in place to prevent duplicate claims and claim issues from being entered or created and processed in CONNECT.

**Original DEO Response:** As has been well documented, the launch of the new RA System did not go as planned. The majority of defects experienced at launch have been corrected and the vendor has been held accountable. Service to claimants and employers remains our top priority and DEO works every day to improve the system and ensure timely and accurate service. The defects identified in this finding were fixed on July 14, 2014, and August 25, 2014. DEO will continue its efforts to ensure that controls are in place to prevent duplicate claims and claim issues from being entered or created and processed in CONNECT.

**Status:** DEO continues to monitor any potential duplication issues. As stated in the original response, the defects associated with this finding were resolved as of August 2014.

**Finding No. 6: Input Forms and Messages**

**Auditor Recommendation:** The Department should continue its efforts to ensure that standardized input forms and documents and error messages are appropriate and valid.

**Original DEO Response:** As has been well documented, the launch of the new RA information system did not go as planned. The launch defect mentioned in this finding has been corrected and the vendor has been held accountable. Service to claimants and employers remains our top priority and DEO works every day to improve the system and ensure timely and accurate service.

Regarding the translation of documents, DEO currently has ongoing monitoring to ensure that standardized input forms and documents and error messages are appropriate and valid. DEO daily reviews Spanish and Creole screens, documents, and responses. If translation issues are identified, they are prioritized and corrected. Issues discovered usually have consisted of one translated word or phrase that needed correction.

Standardized input documents designed for reporting requirements in Spanish and Creole have been created. When a claimant signs into the system using Creole or Spanish, documents are produced in those languages. The defect identified in the second bullet in the P&T finding narrative related to one specific document involving one question on one Spanish document. This defect did not occur on all claimant input documents. This defect was detected on December 9, 2014 and was fixed February 9, 2015. No other defects have been identified with respect to

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this issue.

The one specific defect identified in in the third bullet in the P&T finding narrative with respect to an error message was fixed on February 24, 2014. This defect was a Go Live defect that was detected on November 11, 2013 and fixed as of February 24, 2014.

**Status: DEO continues to monitor Spanish and Creole translations within the system and completes necessary changes as required. As stated in the original response, the defects associated with this finding were resolved as of February 2015.**

**Finding No. 7: Timely Review and Processing Unidentified Received Documents**

**Auditor Recommendation:** The Department should improve processing and reconciliation controls to ensure the complete and timely review and processing of data.

**Original DEO Response:** At this time, DEO has worked through the backlog of documents in the Central Intake unit and we now see timely processing of normal daily volume. DEO will continue to improve processing and reconciliation controls to ensure the complete and timely review and processing of data. As evidenced by the levels of service in adjudication and the contact center, which are a significant improvement over those of the Legacy system, DEO has appropriate processing and reconciliation controls in place to ensure complete and timely review and processing of data.

DEO will continue to monitor documents received and entered into the CONNECT system via Central Intake. If issues are discovered, they will be prioritized and corrected. As of September 2014, issues regarding documents not being properly linked to the appropriate claimant, claim, or issue have been corrected and there have been no new reports of this issue occurring. Minor defects that caused scanning and indexing issues are scheduled to be fixed during the first quarter of 2015.

**Status: DEO continues to assess and improve document intake processes and policies. We have implemented or are implementing changes that will sharply reduce the need for faxed and mailed documents. Additional instances of documents being linked to the wrong account were discovered during the first quarter of 2015. DEO is conducting a thorough review to ensure that affected customers are informed of any misrouting. DEO has implemented procedures to correct these errors.**

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**Finding No. 8: Claimant Identity Verification**

**Auditor Recommendation:** The Department should continue to strengthen claimant identity verification and authentication controls to ensure the validity and authenticity of CONNECT claimant identify information.

**Original DEO Response:** DEO welcomes comments and suggestions on the business practices of the RA Program, but does not believe that these should be considered as audit findings with respect to IT functionality. DEO will continue to strengthen claimant identity verification and authentication controls to ensure validity and authenticity of CONNECT claimant identity information. Public assistance fraud is a nationwide issue. DEO is using cutting edge technology and procedures to proactively address this problem. DEO specifically employs an advanced security team to detect and stop fraud.

The identified issue involving the SSA interface was corrected on August 9, 2014.

**Status:** DEO maintains its original position and continues to make authentication of claimants a priority. In 2014, Florida developed and implemented a digital system – the Fraud Initiative and Rules Rating Engine, or FIRRE – that analyzes unemployment-claims data and detects patterns of fraud. In 2014, after FIRRE was implemented, DEO identified nearly 70,000 fraudulent claims. From January through July 2015, the department identified 42,000 fraudulent claims. The year before FIRRE was implemented, only about 9,600 fraudulent claims were found. These efforts have resulted in Davis Productivity Awards for the last two years and have been recognized by the United States Department of Labor’s Office of Inspector General. In an investigative advisory report, USDOL OIG stated that “Florida officials have recognized the increasing threat to the UI system posed by identity theft, and they have responded by developing a new ID theft pattern recognition system and by implementing a variety of process improvements in its existing service delivery system.”

Due to efforts by its innovative fraud detection team, DEO has taken the lead nationally on combating public benefits and is now advising other states about the Department’s efforts. Claimants who are not properly authenticated must comply with Department requirements in order to ensure they are legitimate applicants prior to receiving benefits.

**Finding No. 9: Manual Overrides**

**Auditor Recommendation:** The Department should establish monitoring procedures to ensure that manual overrides of claimant identity verification failures are appropriate, correct, and documented.



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**Original DEO Response:** DEO welcomes comments and suggestions on the business practices of the RA Program, but does not believe that these should be considered as audit findings with respect to CONNECT functionality. DEO has established monitoring procedures to ensure that manual overrides of claimant identity verification failures are appropriate, correct, and documented. Manual override is a required step of the authentication process when a user fails to self-authenticate and is subsequently determined to be the actual claimant. DEO has implemented strict and rigorous policies and procedures to track claimant authentication and to monitor manual overrides.

**Status:** DEO continues to monitor procedures regarding manual overrides within the system. Only necessary staff have access to perform functions that are required for business functionality. Internal security periodically monitors roles within the system to verify that they are up to date and comply with designated permissions.

**Finding No. 10: Inadequate Monitoring of Claims Activities**

**Auditor Recommendation:** The Department should establish procedures to monitor the status of all claim issues to ensure timely resolution and processing of benefit claims and payments and to ensure that determination decisions are issued based on correct data.

**Original DEO Response:** As has been well documented, the launch of the new RA System did not go as planned. Most of the defects experienced at launch have been corrected and the vendor has been held accountable. Service to claimants and employers remains our top priority and DEO works every day to improve the system and ensure timely and accurate service. All defects identified in this finding were resolved before the fourth quarter of 2014.

DEO has established procedures to monitor the status of claim issues to ensure timely resolution and to ensure that determinations are based on correct data. Timely issue resolution is a part and function of CONNECT design and the hierarchy of issues being assigned via the inbox. As a result, an established procedure is in place in which Adjudication management supplements this design and manages the timely resolution of issues by identifying priority issues using CONNECT reports and by daily manual assignment of issues to ensure timely completion.

**Status:** As stated in the original response, all defects identified in this finding were resolved before the fourth quarter of 2014. DEO continues to monitor and manage the timely resolution of issues by priority within the system.

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**Finding No. 11: Timely Claim Notices**

**Auditor Recommendation:** The Department should address CONNECT processing defects and improve monitoring procedures to ensure that notices are timely distributed and that data is processed accurately and completely.

**Original DEO Response:** As has been well documented, the launch of the new RA System did not go as planned. Most of the defects experienced at launch have been corrected and the vendor has been held accountable. Service to claimants and employers remains our top priority and DEO works every day to improve the system and ensure timely and accurate service. The defects identified in this finding were fixed on April 30, 2014. DEO has addressed CONNECT processing defects and has monitoring in place to ensure that notices are timely and that data is processed accurately and completely. Notices are being timely distributed and data is being processed accurately and completely.

**Status:** As stated in the original response, the defects identified in this finding were resolved on April 30, 2014. DEO continues to monitor the distribution of documents to employers and claimants to ensure timeliness.

**Finding No. 12: Claims Issues Not Being Generated**

**Auditor Recommendation:** The Department should strengthen error handling procedures to ensure that the system operates as designed.

**Original DEO Response:** As has been well documented, the launch of the new RA System did not go as planned. Most of the defects experienced at launch have been corrected and the vendor has been held accountable. Service to claimants and employers remains our top priority and DEO works every day to improve the system and ensure timely and accurate service. The defects identified in this finding were fixed in September 2014 and on December 1, 2014. DEO has taken steps to strengthen error handling procedures to ensure that the system operates as designed. While the initial creation of issues is a CONNECT process that occurs through the system after the claimant has completed the RA application process (if an issue exists), DEO has responded by developing business process tools to monitor and leverage pending issues and to monitor the age of issues that are holding payment so as to ensure timely processing of claims.

**Status:** As stated in the initial response, the defects identified in this finding were resolved by December 1, 2014. DEO is following the auditor's recommendation as it continues to focus on timely and accurate service to claimants.

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**Finding No. 13: Technical System Errors**

**Auditor Recommendation:** The Department should continue its efforts to correct technical system errors in CONNECT to ensure the completeness, accuracy, and integrity of data.

**Original DEO Response:** As has been well documented, the launch of the new RA System did not go as planned. Most of the defects experienced at launch have been corrected and the vendor has been held accountable. Service to claimants and employers remains our top priority and DEO works every day to improve the system and ensure timely and accurate service. The system errors identified in this finding were fixed as of January 14, 2014. DEO will continue its efforts to correct technical system errors in CONNECT. All major technical issues have been resolved and remaining minor issues pertaining to language changes on error messages are scheduled to be resolved during the first quarter of 2015.

A process has been implemented to address any future technical issues and to update system language regarding technical issues. If technical errors occur, a process is in place to immediately monitor the performance of the CONNECT system. Once technical issues are identified, fixes are put into the system to assist in overall performance.

**Status:** The system errors identified in this finding were fixed as of January 14, 2014. The major technical issues identified during the audit period were addressed and corrected by the end of March 2015. As with any internet-based system, this system will experience technical issues; DEO continues to monitor all reported issues and take measures to resolve them.

**Finding No. 14: Reports and Interfaces**

**Auditor Recommendation:** The Department should continue its efforts to resolve defects with reports and interface programs used to assist in the collection of overpayments.

**Original DEO Response:** DEO has resolved defects with reports and interface programs used to assist in the collection of overpayments. CONNECT validations have occurred and reports have been submitted to USDOL since June 2014. The ETA 227 report has been submitted; TOP is functioning as designed. The ETA 5159, ETA 538, and ETA 539 reports have been submitted. Population Validations are currently being reviewed for submission purposes.

**Status:** As stated in the initial response, DEO resolved defects with reports and interface programs used to assist in the collection of overpayments. DEO continues to review and validate any information submitted within reports. Population Validations are ongoing to ensure data retrieved within the system is properly reported.

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**Finding No. 15: Online Screens and Reports**

**Auditor Recommendation:** The Department should continue its efforts to resolve defects with online screens and reports to help ensure the accuracy and completeness of data.

**Original DEO Response:** As has been well documented, the launch of the new RA System did not go as planned. Most of the defects experienced at launch have been corrected and the vendor has been held accountable. Service to claimants and employers remains our top priority and DEO works every day to improve the system and ensure timely and accurate service. The defects identified in this finding were fixed on October 10, 2014, and during December 2014. DEO continues to monitor all performance issues within the system and will continue to resolve defects with online screens and reports if they occur in the future. There have been no staff reported issues or problems concerning inaccuracies in the Manual Payment Detail report. However, DEO will continue to review this issue as staff monitor reports for accuracy on a daily basis. If issues are identified, they will be triaged, prioritized, and corrected.

**Status:** As stated in the initial response, the defects identified in this finding have been resolved. DEO continues to review and monitor any issues with online screens and reports.

**Finding No. 16: Reconciliation Controls**

**Auditor Recommendation:** The Department should ensure that all data interfaced to CONNECT and from other systems is reconciled.

**Original DEO Response:** The audit's intended definition and scope of reconciliation controls is unclear, specifically as this term pertains to the CONNECT system. The CONNECT system does employ several processes for validating the integrity of files associated with interfaces (e.g. successful receipt of the files is monitored). Additionally, several interface programs include logic to ensure data validation during batch processing. For example, social security numbers are checked against the Social Security Administration database for accuracy and integrity. Additionally, several files related to interface systems are checked manually for integrity, thus providing a layer of validation. When there are discrepancies in a file once received, the recipient notifies the sender and resolution of discrepancies occurs at that point.

Several change requests have been implemented, and defects corrected, with respect to the Quarterly Benefits Charging file process. Remaining minor defects and change requests associated with these issues are scheduled to be fixed and implemented during the first quarter of 2015. DEO continues to work closely with the Department of Revenue in order to meet the system requirements of both agencies. DEO has submitted charges for the first, second, and third quarters of 2014.

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**Status:** DEO successfully and timely provided the last quarter's Quarterly Benefits Charging file to the Department of Revenue. DEO continues to monitor the file prior to submission as required and continues to monitor all interface transactions as needed.

**Finding No. 17: Incorrect Overpayments and Charges**

**Auditor Recommendation:** The Department should establish data processing controls to prevent inaccurate and erroneous overpayments and charges from being generated by CONNECT.

**Original DEO Response:** As has been well documented, the launch of the new RA System did not go as planned. Most of the defects experienced at launch have been corrected and the vendor has been held accountable. Service to claimants and employers remains our top priority and DEO works every day to improve the system and ensure timely and accurate service. The defects identified in this finding were fixed on September 9, 2014, and during October and December 2014. DEO has taken steps to establish data processing controls to prevent inaccurate and erroneous overpayments and charges from being generated by CONNECT.

A process is in place to continuously review employer charge amounts for billing purposes. When errors are found, accounts are immediately fixed. A data patch is forthcoming for those currently identified.

DEO will follow up on issues identified in the preliminary and tentative finding if the Auditor General provides specific information and claim IDs.

**Status:** As stated in the original response, defects identified in this finding were resolved as of December 2014. DEO continues to review, monitor, and correct any discovered issues pertaining to potential overpayments, underpayments, or charges to the employer's tax account.

**Finding No. 18: Date and Count Calculations**

**Auditor Recommendation:** The Department should ensure that CONNECT-calculated document request dates and counts are accurate and remain valid.

**Original DEO Response:** As has been well documented, the launch of the new RA System did not go as planned. Most of the defects experienced at launch have been corrected and the vendor has been held accountable. Service to claimants and employers remains our top priority and DEO works every day to improve the system and ensure timely and accurate service. The defects identified in this finding were fixed in September 2014 and on January 10, 2015. DEO will continue to take steps to ensure that CONNECT-calculated document request dates and counts

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are accurate and remain valid.

In DEO's review of this issue, it was determined that due dates for providing requested information were inaccurately calculated for a limited population of claimants and resulted in giving claimants additional time in which to provide additional information. This issue was resolved as of September 2014.

CID, 1333529, issue ID 0003 5097 39-01, distributed on May 16, 2014, was related to a Wage Post Audit, and does not appear to match the issue included in the preliminary and tentative finding for the referenced CID. If the Auditor General provides additional information, DEO will research this issue based on the additional information.

**Status: As stated in the original response, the defects identified in this finding were corrected as of January 2015. DEO continues to monitor all document request dates for accuracy.**

**Finding No. 19: Data Fixes**

**Auditor Recommendation:** The Department should improve the functionality of CONNECT to reduce the need to perform updates and modifications (data fixes) outside the regular application controls.

**Original DEO Response:** DEO converted more than 30 billion records from a patchwork of thirty-year-old Legacy systems. Every system launch, especially one of this magnitude, will experience data conversation defects. DEO has worked to correct any and all data conversion issues. The functionality of CONNECT to reduce the need to perform updates and modifications outside regular application controls is improving. DEO continues to make strides in creating front-end processes to assist with the data issues within CONNECT. The need for Support Requests (data fixes) is decreasing daily. As the system continues to mature, the requirement to perform updates and modifications (data fixes) will be significantly reduced.

**Status: DEO is seeing a significant decrease in support requests related to data corrections. As explained in the original response, this is a result of system maturity and DEO's continuing efforts to optimize processes to assist with data issues. For example, DEO has implemented changes within the system that allow authorized staff to trigger functions such as retro reprocessing payments and entering edit end dates for identified issues.**

**Finding No. 20: User Documentation**

**Auditor Recommendation:** The Department should ensure that the functionality of

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CONNECT operates as designed and as reflected in the user documentation (Guide).

**Original DEO Response:** DEO will continue efforts to ensure that the functionality of CONNECT operates as designed and reflected in the user documentation (Guide). The one issue that is the basis of this P&T finding was fixed on August 1, 2014. Employers are able to file appeals regarding qualifying issues even though chargeability is not addressed on the original determination.

This finding involved one aspect of CONNECT functionality of which, at the time of the audit, DEO was aware, had a defect logged, and a temporary work around in place until the defect was fixed. The audit finding states that DEO staff advised the auditors that the ability of employers to file appeals through CONNECT for nonmonetary determinations not addressing chargeability was not functional and a temporary work around was in place until the defect could be fixed. Auditors were also advised that DEO had taken steps to ensure that the functionality of CONNECT operated as designed as evidenced by the fact that a defect had been logged to address the issue.

**Status:** As stated in the original response, the issue identified in this finding was resolved on August 1, 2014. DEO continues to monitor functionality for employers and claimants within their portals. Upon notification of any potential issue, DEO researches, triages, and takes action to reach resolution.

**Finding No. 21: Monitoring, Review, and Approval Activities**

**Auditor Recommendation:** The Department should establish and implement appropriate monitoring, review, and approval procedures to ensure the accuracy, validity, and completeness of data.

**Original DEO Response:** DEO welcomes comments and suggestions on the business practices of the RA Program, but does not believe that these should be considered as audit findings with respect to IT functionality. While DEO managers and supervisors monitor, review, and approve the work of staff with responsibility for entering data into CONNECT, this preliminary and tentative finding on the management review of manually entered data is not a finding about CONNECT functionality and is not within the scope of the IT audit of CONNECT. The finding narrative states, in part, "Specifically, our review disclosed that manually entered data was not subject to management review unless the data was selected as part of other claim review processes, such as the weekly in-house quality review or other required quality review processes." Management review of manually entered data is not a CONNECT function. It is a business process carried out by staff assigned to quality reviews and managers in reviewing work performed by employees. In the finding narrative, the auditor acknowledges that DEO performs weekly in-house quality reviews of claim cases.

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**Status:** DEO maintains its original position and continues to monitor, review, and update procedures as needed to ensure accuracy, validity, and completeness of data.

**Finding No. 22: Data processing Exceptions and Errors**

**Auditor Recommendation:** The Department should ensure that CONNECT correctly and completely logs all relevant transaction changes.

**Original DEO Response:** As has been well documented, the launch of the new RA System did not go as planned. Most of the defects experienced at launch have been corrected and the vendor has been held accountable. Service to claimants and employers remains our top priority and DEO works every day to improve the system and ensure timely and accurate service. The majority of the defects identified in this finding were fixed on January 14, 2015, and any remaining issues will be resolved during the first quarter of 2015. DEO will continue efforts to ensure that CONNECT correctly and completely logs all relevant transaction changes. Staff continue to monitor any issues pertaining to event logs within the system. As issues are identified, they are triaged and corrected.

**Status:** The defects identified in this finding have been corrected. DEO continues to monitor any issues pertaining to event logs.

**Finding No. 23: Independence of the RA program Quality Review Function**

**Auditor Recommendation:** The Department should review and implement appropriate action to ensure compliance with applicable Federal regulations regarding the independence of the RA Program quality control function.

**Original DEO Response:** As a result of the notification of this preliminary and tentative finding, DEO reviewed its organizational structure and confirmed with USDOL that the DEO organizational structure in place is in compliance with 20 CFR 602.20. DEO quality control processes are conducted by Benefits Timeliness Quality (BTQ) and Benefit Accuracy Measurement (BAM) units, which report directly to the RA Bureau Chief. This organizational structure is used by DEO, as well as many states, to separate quality control activity from benefit operations while facilitating access to information necessary to perform quality control responsibilities.

This preliminary and tentative finding appears to be based on temporary assignments of some BAM unit staff to Adjudications during the implementation of CONNECT. During the launch of the new system, it was necessary to temporarily reassign staff to better serve claimants. This temporary reassignment to serve claimants does not render DEO out of compliance with



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applicable federal regulations requiring the independence of RA program quality control units.

**Status: DEO maintains its original position explained above. It should also be noted that the temporary reassignment of staff cited in this finding has ceased.**

**Finding No. 24: Access Control Procedures**

**Auditor Recommendation:** The Department should enhance the Security Guide to include instructions on what roles are to be applied to what positions within a specific department and what combinations of roles should not be assigned to one employee to ensure an appropriate separation of duties. Additionally, Department Access Forms should be improved to adequately document the specific CONNECT access privileges assigned to users. Access Forms should be created, signed, and maintained by the Department for all employees granted access to CONNECT.

**Original DEO Response:** All CONNECT training guides and forms are continuously monitored and updated as necessary. DEO is currently developing a more robust Departmental Security Officer Quick Reference Guide based on new functionality within the system. A new access request form has been created for the Internal Security Unit and access within the system is always closely monitored. Additionally, DEO has recently implemented an enhanced security policy and is currently reviewing all user profiles to ensure appropriate access is granted to perform assigned duties. The adjudication staff profiles have been reviewed and access to the system is limited to those functions needed to perform their job duties.

**Status: DEO continues to update all guides and materials as needed. This will be an ongoing process due to changes, enhancements, and procedures needed to operate the system. System security and profiles are reviewed for appropriate access on a regular basis.**

**Finding No. 25: Periodic Review of Access Privileges**

**Auditor Recommendation:** The Department should develop and implement procedures for the periodic review of access privileges, including those users with privileged network access, to help ensure that privileges assigned are authorized and appropriate.

**Original DEO Response:** DEO has procedures in place providing for periodic review of access privileges, including of those users with privileged network access, to help ensure that privileges assigned are authorized and appropriate. All users existing in Legacy were converted into CONNECT and mapped according to their existing job duties. DEO is currently reviewing all user profiles to ensure appropriate access is granted to perform assigned duties. The

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adjudication staff profiles have been reviewed and access to the system is limited to those functions needed to perform their job duties.

The following are reports that have been implemented to monitor user activity: Change report, 33762 – Daily Accounts Modified report, 33772 – Ad Hoc report for all users, 33790 – Manually paid weeks, and 53635 – Non Mon Pay/non Change Report have all been implemented. 53636 – Forced Override Report and 56909 – Track Inactivity Report are currently in process.

**Status:** DEO continues to monitor the reports described above as needed. Furthermore, periodic reviews have been performed regarding staff roles and access within the CONNECT system. DEO continues to ensure staff have the proper access for their daily functions.

**Finding No. 26: Appropriateness of Access Privileges**

**Auditor Recommendation:** The Department should limit account access privileges to data and IT resources to promote an appropriate separation of duties, restrict users to only those functions necessary for their assigned job duties, and provide for individual accountability.

**Original DEO Response:** DEO acknowledges the importance of limiting access privileges. The audit's finding narrative wrongly implies that DEO does not have measures in place to review appropriate access levels for staff. However, the DEO Reemployment Assistance (RA) Internal User Guide for Resource Access Control Facility (RACF) Security Officers outlines the responsibility to restrict privileges to individuals who need access in performance of their official duties. In accordance with this and other authoritative rules (e.g. Florida Administrative Code Rule: 71A-2.006 that ensures access privileges) DEO will continue to find ways to ensure appropriateness of access privileges.

**Network Administration Access:** The elevated privileges for one user have been removed. DEO is in the process of developing plans to ensure procedures are in place that minimize shared use of system accounts and will develop procedures that log such activities. A review is underway to determine appropriate privileges regarding the service accounts.

**CONNECT Application Access:** During conversion of Legacy data, all existing Legacy users were transferred into CONNECT. Any user with a Legacy ID was converted into CONNECT. Existing roles and work duties were mapped in the CONNECT matrix for that required job. The one claims contact center employee referenced in the preliminary and tentative finding was properly mapped based on the Legacy ID. Managers were instructed to review access for users and have access removed for users no longer employed.

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A user not previously logging onto the system is not a sole indicator that access should be removed. The two listed examples are both members of IT and have an IT function role within CONNECT. CONNECT application access is needed to perform system health check post deployment activities, monitor/validate system performance, triage, and issue resolution. It should be noted that access for the two employees is read only.

The last example referenced in the narrative findings was a user in the Appeals unit who was listed for certain functions within the Legacy system and therefore transferred into the new system with access appropriate to those functions. The system roles assigned were appropriate and were removed when duties changed for the employee.

CONNECT Database Access: The issue regarding database access was resolved on August 14, 2014. The generic ID is the application user ID and the transactions are logged and can be traced to individuals. DEO is currently limiting and monitoring account access privileges to data and IT resources.

**Status: DEO has developed and implemented procedures for the periodic review of access privileges, including of those users with privileged network access. DEO also continues to monitor staff access within the network systems and perform reviews to ensure all staff have functions properly assigned to them.**

**Finding No. 27: Timely Deactivation of Access Privileges**

**Auditor Recommendation:** The Department should ensure that access privileges of temporary, transferred, or former employees and contractors are deactivated in a timely manner when employment or contractual services are terminated to minimize the risk of compromise to Department data and IT resources.

**Original DEO Response:** DEO recognizes the importance of timely deactivation of accounts for the purposes of denying access to persons who are no longer affiliated with DEO. The DEO RA Security Manual specifies when accounts should be deactivated such as employee reassignments, terminations, and extended leaves of absence. DEO will continue to develop procedures for account deactivation to ensure data integrity and confidentiality.

Network Administrative Access: The contracted user mentioned above was an IT background administrator and it is a common IT practice with this particular role to delay the disabling of the user account to ensure the account is not being used by any services provided by IT. As for the three additional contracted users, all their access to the Network was disabled the day prior or the day after separating with DEO. It is important to note the three listed contractors did not

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have access to the CONNECT system, but would need network access for computing purposes and DEO email.

CONNECT Application Access: The listed employee transferred to another RA program area on May 1, 2014, and was granted appropriate access upon her transfer.

During conversion, all existing Legacy users were transferred into CONNECT. As with many users, the user's access mentioned above existed in Legacy and was therefore transferred into the new system. Managers were instructed to review access for users and have access removed for staff no longer employed.

As for the Workforce Program Support employee example referenced above, the user was granted access to assist with a project. When the employee's duties changed, the access was removed on January 7, 2015.

CONNECT Database Access: In the example referenced above regarding a former contractor's database access, the user's access was removed on August 14, 2014. It is important to note the user never logged into the CONNECT production database. A process is in place to ensure access privileges of temporary, transferred, or former employees, and contractors are deactivated in a timely manner when employment or contractual services are terminated to minimize the risk of compromise to Department data and IT resources.

**Status: DEO continues to monitor staff access within the network systems. Periodic reviews are completed to ensure all staff have the proper functions assigned to them.**

**Finding No. 28: Issue and Workflow Assignments**

**Auditor Recommendation:** The Department should improve CONNECT access controls to limit access privileges to only those privileges required to perform users' assigned job duties.

**Original DEO Response:** DEO will continue to fix any defects necessary so that CONNECT access privileges are limited to only those privileges required to perform users' assigned job duties. The minor defect that allowed staff to alter access has been logged and will be fixed during the second quarter of 2015.

**Status: DEO continues to monitor staff access within the network systems. Periodic reviews are completed to ensure all staff have the proper functions assigned to them.**

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**Finding No. 29: Other Security Controls – User Authentication, Logging, and Monitoring**

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

**Original DEO Response:** DEO has implemented appropriate security controls related to user authentication and logging to ensure the confidentiality, integrity, and availability of DEO data and IT resources.

**Status:** DEO continues to closely monitor all controls surrounding user authentication and logging to ensure the confidentiality, integrity, and availability of DEO data and IT resources.

**Finding No. 30: Application Program and Configuration Changes**

**Auditor Recommendation:** The Department should improve CONNECT application program and configuration change management procedures to ensure that all program and configuration changes moved into production are properly documented, authorized, tested, and approved.

**Original DEO Response:** DEO does not agree with a significant number of the findings listed in the auditor's narrative. Out of the approximately 82 instances mentioned in the finding narrative, DEO disagrees with 43 as these items did not have proper approvals and testing documentation. DEO will continue to strengthen its tracking, testing, and approval process of defects. In March 2014, controls were implemented for the ALM program regarding tracking and approvals. Going forward, only limited staff have access to change statuses. All tickets are updated with testing results, etc. for tracking purposes. All build items go through an approval process prior to being implemented.

**Status:** DEO has continued to improve ticket resolutions within the Application Lifecycle Management system. All tickets are required to move through the proper triage, approval, and implementation steps with updated information on the ticket. All testing scenarios, additional steps, testers, and approvals are to be noted on each ticket. DEO business units and IT are working together to move successfully through this process.

**Finding No. 31: Data Conversion Reconciliations**

**Auditor Recommendation:** The Department should address any remaining inaccuracies in data conversion to ensure the integrity of CONNECT data.

**Original DEO Response:** DEO converted more than 30 billion records from a patchwork of thirty-

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year-old Legacy systems. Data migration and conversion are often some of the most complex activities associated with any system development and every system launch, especially one of this magnitude, will experience data conversation defects. DEO has worked to correct data conversion issues and will continue to address any remaining inaccuracies in data conversion.

**Status: DEO maintains its original position described above. If an issue regarding converted data is identified, DEO is able to timely address and correct any inaccuracy.**