



LCCC Audit Recommendations Status Report As of December 31, 2020

Inspector General Department



Tim Parks, Chief Internal Audit Officer/Inspector General



Lee County Clerk of Court
Audit Recommendations Status Report
As of December 31, 2020



To: The Honorable Linda Doggett, Lee County Clerk of the Circuit Court & Comptroller

From: Tim Parks, Chief Internal Audit Officer/Inspector General

Date: January 20, 2021

Re: Lee County Clerk of Court & Comptroller (LCCC)
Audit Recommendations Status Report as of 12/31/2020

Dear Ms. Doggett,

The Inspector General Department has completed its *LCCC Audit Recommendations Status Report as of December 31, 2020*, which reflects the implementation status of outstanding audit report recommendations for the Lee County Clerk of Court & Comptroller. The report fulfills the IG Department's accountability for reporting on issues through their resolution.

This audit activity conforms to the Institute of Internal Auditor's (IIA) *International Standards for the Professional Practice of Internal Auditing (Red Book)* and the Association of Inspectors General (AIG) *Principles and Standards for Offices of Inspector General*.

The follow-up on recommendation status was conducted during the fourth quarter of 2020. We reviewed the status of the audit recommendations with the department personnel responsible for implementing the audit recommendations.

The follow-up report contains information regarding each outstanding recommendation, including recommendation status, management action taken, and Internal Audit follow up notes.

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

Sincerely,

A handwritten signature in blue ink that reads "Tim Parks".

Tim Parks, CIA, CIG, CIGI, CGI
Chief Internal Audit Officer/Inspector General
Inspector General Department
TJP/GK



Lee County Clerk of Court Audit Recommendation Status Report As of December 31, 2020



LCCC Tax Deed Sales (Project 2019.13, Issued December 2019)		
Change Access Management: Periodic user password change is not required		
Observation	Recommendation	Management Response
<p>The Real Auction system does not require periodic user password changes. We requested a user password change report from the vendor. As of the reporting date of August 16, 2019, out of the 49 active tested users:</p> <ul style="list-style-type: none"> • Thirty-one users had no record of changing password since being added as a user • Sixteen users changed their passwords over 90 days ago • Two users changed their passwords within 90 days <p>IT best practice suggests maximum password age of 90 days.</p>	<p>We recommend that the Courts Department work with DoIT and the vendor to implement a built-in control in the system to require user password change at least every 90 days</p>	<ul style="list-style-type: none"> • <u>Courts Response</u>: Courts will request an enhancement from the vendor for RealTDM and RealAuction websites. • <u>Compliance Date</u>: Dependent on the vendor
Estimated Implementation Date	Revised Implementation Date	Status
3/31/2020	12/31/2020	Closed – Management accepts risks
Last Status Update	Current Recommendation Action	IA Follow-up Notes
3/24/2020	<p>DoIT Response</p> <ul style="list-style-type: none"> • DoIT is unable to find enhancement requests submitted for 90 day password change control. DoIT requests the Courts Department verify if this request was made directly to the vendor, or was submitted to DoIT for processing. If the request has not been made, Courts should submit the request to DoIT for processing as an enhancement request. 	<p>IA has forwarded DoIT response to Courts Department, waiting for Courts Department management response to confirm agreement and any action to be taken.</p>



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6/24/2020	Per Chief Officer of Courts “Court Fiscal Operations Supervisor will determine if enhancement requests were submitted. If not, we will provide those to DoIT by the end of July.”	
9/28/2020	Per Court Operations Support Manager “This request has been submitted to DoIT at this time. This recommendation will also rely on Real Auction implementing.”	N/A
11/17/2020	Per DoIT email "completed ticket 105597, completed on 9/25/20. Resolution was: Real Auction advised that they are already looking a multi factor authentication for system security. This will take a number of months to implement. They have also advised that the multi factor authentication is the avenue they will be pursuing instead of a 90 day password change."	Implementation cannot be implemented (vendor confirmation) and the recommendation subsequently drops from the report, at least until a new resolution can be developed.
Change Access Management: Terminated employees were not disabled timely from internal folder, including confidential Information folder		
Observation	Recommendation	Management Response
We noted that four terminated LCCC employees’ access were not disabled to an internal folder for tax deed sales that contained confidential information. Untimely removing of former employees from the users list is a potential risk for unauthorized access to confidential or exempt information when employees terminate, change departments, or change roles within LCCC.	We recommend that Courts Department create and implement a change access management policy, to include working with DoIT and Court Operation Support for timely removal of inactive users from accessing internal network folders containing confidential information.	<u>Courts Response:</u> Courts will advise DOIT Leadership of the recommendation. DoIT handles access to internal network folders <u>Compliance Date:</u> See prior response.
Estimated Implementation Date	Revised Implementation Date	Status
3/31/2020	12/31/2020	Implemented and closed
Last Status Update	Current Recommendation Action	IA Follow-up Notes
3/25/2020		Waiting for Courts Department to confirm agreement with DoIT. Due to COVID-19, this recommendation is deferred to 6/30/2020.



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6/26/2020	Per Chief Officer of Courts, Court Intake and Court Operations Managers, “Will provide DoIT the list of Clerks that should have access to the websites and those positions that are able to request modification of access by this Friday June 26 th .”	To be confirmed by Courts department management.
9/28/2020	Per Court Operations Manager “Based on our I drive clean up this folder no longer exists. The documents are now stored in a new folder. I have submitted a request for a review of the new folder access to ensure only Court Personnel can view the contents. If any non-court personnel can view the contents a request to DoIT will be made to remove their access.	N/A
12/23/2020	Management implemented the recommendation.	N/A
Confidential Information Access: Vendor employees user set up		
Observation	Recommendation	Management Response
Four former Real Auction employees (current access disabled) were set up using their personal email addresses for accessing the systems. By using personal email addresses instead of company email addresses, there are security risks that confidential information may be sent to those personal email accounts.	We recommend that the Court Department and DoIT work with Real Auction to: <ul style="list-style-type: none"> • Ensure that current and future users are set up using only Real Auction company’s secured email addresses. • Receive periodic vendor users' verification information for the Court Department and DoIT to review. 	<ul style="list-style-type: none"> • Courts Response: Courts will request from the vendor to have their employees change their email address to company secured email addresses for all existing and new employees. Courts will advise DoIT leadership of periodic verification information for the vendor employees. • Compliance Date: Dependent on vendor
Estimated Implementation Date	Revised Implementation Date	Status
3/31/2020	12/31/2020	Implemented and closed
Last Status Update	Current Recommendation Action	IA Follow-up Notes
3/24/2020	<u>DoIT Response</u> <ul style="list-style-type: none"> • DoIT does not find an incident request for email address changes to the vendor. Courts should verify if they submitted request directly to the vendor. If the request has not been made, Courts should submit the request to DoIT for processing. 	IA has forwarded DoIT response to Courts Department, waiting for Courts Department management response to confirm agreement and any action to be taken.



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	<ul style="list-style-type: none"> DoIT has not been advised by the Courts Department of the need for periodic verification information of vendor's employees. DoIT requests that Courts Department schedules a meeting to discuss requirements of each of our Departments to proceed with this recommendation. 	
6/24/2020	Per Chief Officer of Courts "Court Fiscal Operations Supervisor will determine if enhancement requests were submitted. If not, we will provide those to DoIT by the end of July."	N/A
9/28/2020	Per Court Operations Manager "This request has been submitted to DoIT at this time. This recommendation will rely on Real Auction implementing though."	N/A
11/17/2020	Management implemented the recommendation.	N/A
LCCC Comprehensive Case Information System (Project 2020.05, Issued June 2020)		
CCIS User Access Reviews		
<p>There were 181 valid Active CCIS users that included LCCC users (107) and other agency users (74) at the start of this review. There was no periodic review to ensure that the users all required continued access to CCIS.</p> <p>As a good practice, the CCIS Administrator should be reviewing user access on at least a yearly basis to ensure the access is relevant and needed.</p> <p>Access reviews of LCCC and other agency users helps to verify all accounts have been correctly assigned. Without the user reviews it is difficult to ensure user accounts reflect job positions changes or invalid user accounts.</p>	<p>We recommend that the CCIS Administrator perform user access reconciliations of all CCIS users on at least an annual basis (LCCC and other government agencies).</p>	<p>CCIS Administrator is now actively developing a process to perform user access reconciliations that will be done at least annually.</p>



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Yearly CCIS user access reconciliations will help to: <ul style="list-style-type: none"> • Safeguard user login and password controls and reduce the risk of unauthorized users. • Prohibit use of CCIS functions not related to official business. 		
Estimated Implementation Date	Revised Implementation Date	Status
8/31/2020	10/30/2020	Implemented and closed
Last Status Update	Current Recommendation Action	IA Follow-up Notes
9/10/2020	CCIS User Administrator is conducting semiannual review to confirm users eligibility for CCIS. This policy's final draft is under review and is planned to be approved by October 2020.	N/A
12/10/2020	Management implemented the recommendation	N/A