Detailed Follow Up Report - Auditor Determined Status

Rec#	Recommendation	Auditor FollowUp	City Auditor's Status	Closed
1904	**ActiveNet Application Controls**	Issued:	**5/9/2019**	
1A	The Community Services Division should expand the current policies and procedures to require supervisors to justify departures from the matrix and ensure training is provided before account access is authorized. Further, CSTG should document reviews of all user accounts, including generic accounts, and require supervisory approval before reinstating a stale account. As well, the division should develop an ActiveNet remote access policy limiting access to authorized uses.	Oct 2019: Management reported that the Community Services Technology Group (CSTG) has updated the user account permissions matrix and processes for reviewing user accounts, including stale accounts. Still pending is the plan to work with City IT to develop a remote access policy. May 2020: CSTG provided a copy of its remote access policy, which it plans to disseminate to division stakeholders later in the summer. Sept 2020: CSTG now plans to disseminate its updated policy in October. March 2021: The department reported the information has been disseminated; auditors requested documentation. May 2021: The department reported the policy has been submitted for management approval.	In Progress	☐
1B	The Community Services Division should remind department staff to timely notify CSTG to remove ActiveNet access for every employee termination, even those where an employee may potentially return to City employment in the future.	Oct 2019: Management reported that CSTG was not notified for a separation that occurred in May. CSTG has since reminded the division staff and HR to notify them on all Community Services separations. Auditors will review progress on this recommendation for a future update. May 2020: Auditors reviewed the updated procedures, which include immediate notification to CSTG for the division's separations.	Implemented	☑

Detailed Follow Up Report - Auditor Determined Status

Rec#	Recommendation	Auditor FollowUp	City Auditor's Status	Closed
2A	The Community Services Division should work with City IT to develop a formal policy regarding the classification and handling of PII. Any ActiveNet fields containing PII should be identified and training should be provided to staff regarding the handling of customer PII.	Oct 2019: Management reported that CSTG's plans to work with City IT to develop a formal policy regarding classification and handling of PII are still pending. May 2020: After meeting with City IT, CSTG reported it is responsible to identify where PII is in this system. In addition, City IT is formalizing a data governance plan and considering developing PII training. Sept 2020: CSTG reported the status has not changed since May. The group is waiting for City IT to formalize its data governance plan and possible PII training. March 2021: This department did not report an updated status. May 2021: The department reported that data privacy training has been made available for all City employees. The CSTG will work with City IT training to develop a training plan to ensure staff take the training during on-boarding and annually as a review. Also, the ActiveNet fields containing PII will be identified for staff.	In Progress	☐
2B	The Community Services Division should update the Essential Records Listing with ActiveNet information.	Oct 2019: Management reported that CSTG has worked with the Parks and Recreation records manager to update the Essential Records listing and is working with Human Services to update its listing. May 2020: CSTG reported that Essential Records listings have been updated for Human Services. Auditors reviewed the related Records Manager correspondence and listings.	Implemented	☑
3A	The Community Services Division should regularly request and review contract-required security compliance reports to ensure the vendor is maintaining effective security controls.	Oct 2019: Management reported that the vendor has provided its applicable 2018 report, though it is not yet clear if the vendor will comply with certain security related requirements. Further, CSTG has created a scheduled reminder to request these reports on an ongoing basis. Auditors will review these reports for a future update. May 2020: CSTG provided a copy of one compliance report. Auditors will continue to follow up on the status of others. Sept 2020: CSTG reported that ActiveNet stated it is sending the other report, but it has not been received. March 2021: The department worked to obtain improved information in the vendor-provided assessment.	Implemented	☑

Detailed Follow Up Report - Auditor Determined Status

Rec#	Recommendation	Auditor FollowUp	City Auditor's Status	Closed
3B	The Community Services Division should work with Active Network to obtain activity logging reports on a continuous basis and establish a process for monitoring changes and unusual activity.	Oct 2019: Management reported that CSTG has established a process to request and review activity logging reports from the vendor each month. Auditors will review the related documentation for a future update. May 2020: Auditors reviewed the activity reports and related documentation. The logs show no issues found in the reported information.	Implemented	☑
3C	The Community Services Division should work with Active Network to create a report that will assist the division in verifying compliance with contractual fees.	Oct 2019: Management reported that CSTG has worked with vendor support to identify a report that can be used to verify compliance with contractual fees. The current report has a bug that the vendor is working to resolve. May 2020: The vendor has not yet corrected issues with this report. Sept 2020: CSTG stated the vendor provided an Agency Payment - Split Amounts report to be used to verify contractual fee compliance. However, documentation is not yet available to confirm that the report allows the department to verify fees. March 2021: The vendor is not providing a sufficiently detailed report to facilitate the reconciliation, but department staff has created an analytic report to assist their review.	Implemented	☑
4A	The Community Services Division should consider enabling system controls requiring supervisor approval of refunds, including setting a minimum refund amount for requiring supervisor approval.	Oct 2019: Management reported that the division has decided to not enable the system controls requiring supervisory approval, including setting a minimum amount for the approval. Instead, the division staff have established a process to train and reinforce supervisory reviews, including the trainer meeting on-site with each supervisor to go over the process and ensure each supervisor submits a workorder to receive the refund report automatically each month. Auditors will review refund documentation for a future update. May 2020: Due to the current pandemic and closed City facilities, the status of this recommendation will be reviewed at a future date. Sept 2020: CSTG reported facilitating a refund review training in August and supervisors have submitted work orders to schedule their refund review automated reports.	Part Impl'd	☑

Detailed Follow Up Report - Auditor Determined Status

Rec#	Recommendation	Auditor FollowUp	City Auditor's Status	Closed
4B	The Community Services Division should formalize incident response plans.	Oct 2019: Auditors reviewed CSTG's written incident response plan.	Implemented	☑
4C	The Community Services Division should work with City IT to explore technical solutions for data loss prevention.	Oct 2019: Management reported that CSTG's plan to work with City IT to explore technical solutions for data loss prevention is still in process. May 2020: CSTG reported consulting with City IT regarding this recommendation, and City IT will evaluate it.	Part Impl'd	☑