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March 25, 2008

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Mr. David W. Martin
Florida Auditor General
G74 Claude Pepper Building
111 West Madison Street
Tallahassee, Florida 32399-1450

Dear Mr. Martin:

Please find enclosed a copy of our Follow-Up Report for the *Auditor General's Information Technology Audit (Report No. 2006-087)*, which is being forwarded to your office as required by statute, and as referenced by *Auditor General QAR (Report No. 2008-053)*.

If further information is needed, please contact Trevor Phillips, Director of Auditing, at 488-6068.

Executive Staff

Kenneth D. Haddad
Executive Director

Victor J. Heller
Assistant Executive
Director

Karen Ventimiglia
Deputy Chief of Staff

Sincerely,

A handwritten signature in black ink, appearing to read "James T. Knight III".

James T. Knight III
Inspector General

Office of Inspector
General
James T. Knight III
Inspector General

(850) 488-6068
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cc: Legislative Auditing Committee

*Managing fish and wildlife
resources for their long-
term well-being and the
benefit of people.*

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Agency Follow-Up Report Auditor General's Information Technology Audit

Report No. IA-0702

Report prepared by: _____ //Signed// _____ Date 3/21/2008
Trevor Phillips, Director of Auditing

Approved by: _____ //Signed// _____ Date 3/21/2008
James T. Knight III, Inspector General

Reviewed by: _____ //Signed// _____ Date 3/24/2008
Kenneth D. Haddad
Executive Director
Florida Fish and Wildlife Conservation Commission

**AGENCY FOLLOW-UP REPORT
AUDITOR GENERAL'S INFORMATION TECHNOLOGY AUDIT
SELECTED STATE AGENCIES' PUBLIC WEB SITES
FOR THE PERIOD JULY 2004 – JUNE 2005**

EXECUTIVE SUMMARY

The purpose of this follow-up review is to report on the implementation status of certain corrective actions performed by the FWC Office of Information Technology (OIT) in response to the Auditor General's Information Technology Audit (Report No. 2006-087) published in January 2006. In accordance with Section 20.055(5)(g), Florida Statutes, the Office of Inspector General is required to follow up and verify implementation of all findings and recommendations issued by the Auditor General (AG). We reviewed the AG findings and the responses by OIT, and concluded that FWC has successfully implemented most of the AG recommendations. There remain two outstanding issues which management commits to complete by the end of this fiscal year:

- Implementation of a policy regarding the protection of personal information
- Implementation of an IT disaster recovery service

We will follow-up on both issues to ensure completion.

BACKGROUND

FWC increasingly relies on electronic government (e-Gov) services for the delivery of services to citizens; dissemination of information; and more efficient government management. E-Gov utilizes information technology (IT), including the Internet and Intranet, to interact with citizens, FWC employees, and those conducting business with FWC. Examples of the services provided are direct business services (licenses, permits and vendor business) as well as informational services (efficient government, emergency, and management portals). The AG performed a multi agency audit of the Information Technology (IT) aspects of these components. The AG's objectives were to determine if the various agencies' web sites were statutorily compliant as well as systematic in their attributes throughout their applications. The OIG conducted a follow up audit to verify that the recommendations and responses to the Auditor General's report were being implemented.

PURPOSE, SCOPE AND METHODOLOGY

The **purpose** of this audit was to follow-up FWC's response to the AG's Report No. 2006-087, as required by statute. Normally, a follow-up review would be conducted

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within six months of the original report's publish date. This review was delayed because of certain unanticipated special projects.

The **scope** of our examination was limited to verifying whether or not FWC management had acted on the report's recommendations. The period originally audited was July 1, 2004 through June 30, 2005. The follow-up review covers FWC management actions taken after the original reports publish date through February 2008.

The **methodology** included testing certain FWC web site functions; reviewing internal IT policies and procedures; and interviewing OIT personnel. This review was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* published by The Institute of Internal Auditors.

FINDINGS AND RECOMMENDATIONS

The OIG obtained documentation and analyzed the most recent data supporting the reported activities associated with the submitted recommendations. The following list of findings and accompanying updates display the extent to which implementation of the recommendations could be performed:

AG Finding #1 — Accessibility for people with disabilities

Agencies could not demonstrate that certain Web Sites and e-Gov services were accessible to people with disabilities.

Recommendation:

The aforementioned agencies should make appropriate enhancements to their Web sites and applications to comply with Section 508¹ accessibility requirements, as required by the STO Enterprise Standard and Executive Order 05-133. Further, agencies should, in future contracts for e-Gov services, include provisions for the delivered services to meet Section 508 accessibility requirements. The agencies should consult, as appropriate, with the ADAWG and the Governor's Accessibility Electronic and Information Technology Task Force to achieve these objectives.

OIG Follow-Up Finding:

State law (Laws of Florida, Ch. 2006-227) now requires that all state agencies conform to the Standards for accessible electronic information as provided by Section 508 and Florida Statutes, Chapter 282. The new state law also applies to competitive solicitations issued or new systems developed by a state agency on or after July 1, 2006.

FWC has implemented the following to comply with the AG's recommendations for this finding:

¹ Section 508 of the Rehabilitation Act of 1973, as amended, and 29 U.S.C. s.794 (d), including the regulations set forth under 36 C.F.R. Part 1194

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- OIT has drafted a policy, Application Standards for Web Site Design and Coding, which states that agency web sites must be section 508 compliant. The policy also contains a section 508 compliance checklist.
- FWC is using AccVerify (test management system) on a monthly basis to validate and repair web page content for quality, accessibility, privacy, and usability.
- For E-Gov services contracts, FWC now includes provisions for delivered services to meet Section 508 accessibility requirements.
- FWC's request for proposal (RFP) for the new web content management system states the system must facilitate ADA compliance with section 508. The content management system will contain templates which are ADA compliant; all web content will be entered into these templates to ensure compliance.
- The FWC Chief Information Officer (CIO) and Webmaster are active members of the State Agencies' CIO Council. The FWC Webmaster also participates in the CIO Council's Technology Accessibility for All Floridians Committee, Enterprise Guidelines Subcommittee. Active membership in both of these organizations will assist in the maintenance of accessibility requirements.
- The Total License System web site currently complies with the minimum standards of Section 508 when tested with AccVerify.

Finding #2 - Standards for Coding and Design

Certain STO enterprise standards for coding and design of Web sites were not consistently followed.

Recommendation:

The above listed agencies should comply with the provisions of the State Enterprise Standard in the areas described above.

OIG Follow-Up Finding:

FWC has drafted a policy regarding application standards for web design and coding. In addition, FWC has revised its website banners to include the hyperlinked MyFlorida logo (hyperlink directed to www.MyFlorida.com).

Finding #3 – Written Web Content Management Strategies

Agencies lacked written Web content management strategies for ensuring the integrity of Web site content.

Recommendation:

All agencies should develop a content management strategy to provide increased assurance of maintaining Web site content that is consistent with management's intent.

OIG Follow-Up Finding:

FWC contracted with RedDot Solutions to develop a website content management system. The system has been developed and content migration is currently underway.

Finding #4 – Written Procedures

The six agencies within the scope of the audit that had e-Gov applications either had not established procedures, or had incomplete procedures, for response strategies to be followed if personal identification information was compromised in a security breach.

Recommendation:

All agencies should establish and maintain a management-approved written response strategy, consistent with the requirements of Florida law, to be followed if the security over confidential personal information is breached.

OIG Follow-Up Finding:

OIT has drafted a response strategy regarding the protection of personal information, but to date this strategy has not been formally adopted as policy.

FWC-OIT Management Response:

Adoption of such policy is expected by the end of this fiscal year (6/30/08).

Finding #5 – Hyperlink Deficiencies

We noted deficiencies in hyperlinks within the agencies' Web site.

Recommendation:

Each agency should periodically review its strategy to manage the risk of broken and incorrect hyperlinks within its Web site and deploy resources accordingly. Also disclaimer statements should be maintained on Web sites to alert users that certain hyperlinks to outside sources represent content not controlled by the agencies and do not necessarily reflect the agencies' views.

OIG Follow-Up Finding:

In an effort to reduce broken and incorrect links, FWC performs routine hyperlink checks using HiSoftware. FWC's new content management system will also assist in the reduction of broken links.

FWC web pages include the following disclaimer statement:

“In accordance with Ch. 372.0222, F.S: The inclusion on this web site of advertising, logos or web site links, or reference to any products, process, service, trade name, trademark, or manufacturer, is not an endorsement by the State of Florida or the Florida Fish and Wildlife Conservation Commission (FWC) of any such advertisers, links, entities, products, services, names or marks.

External links are made available to assist the Internet user in his or her search. FWC has not screened individual links or organizations that appear on this site or that may be electronically linked to this site. FWC strongly urges all users of this site to conduct their own investigation of any individual, organization, product or service appearing on this site or that is electronically linked to this site. FWC neither endorses links nor approves of links external to this web site. FWC has no control over and takes no responsibility for any such link's operation or content. The links within the web site are not an exclusive listing of organizations or entities of any type.”

Finding #7 – Web Site Availability during Emergencies

Written procedures had not been fully developed by several agencies for maintaining Web site availability during the periods of high demand created by emergency events, such as hurricanes. Additionally, not all agencies addressed the recovery of e-Gov services in their IT disaster recovery plans.

Recommendation:

Agencies should establish written procedures to ensure the ability to respond effectively to emergency events via their Web sites. Further, all agencies not maintaining written e-Gov recovery procedures should reevaluate these services for possible inclusion in their IT disaster recovery plans to provide increased assurance of the continuity of essential agency e-Gov functions. E-Gov services selected for recovery should be periodically tested to substantiate the viability of the planned procedures.

OIG Follow-Up Finding:

Due to budget constraints, FWC has been unable to purchase service agreements to include disaster recovery services. Currently, there is no assurance of the continuity of essential e-Gov functions during emergency events.

FWC-OIT Management Response:

OIT has purchased software to facilitate its disaster recovery process and is issuing an RFP for disaster recovery services. OIT fully expects to have this service operational by the end of this fiscal year (6/30/08).