



FLORIDA PAROLE COMMISSION

TENA M. PATE, Chair
BERNARD R. COHEN, SR., Vice-Chair
MELINDA N. COONROD, Secretary

RICK SCOTT, Governor
PAM BONDI, Attorney General
JEFF ATWATER, Chief Financial Officer
ADAM PUTNAM, Commissioner of Agriculture

May 1, 2013

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

Re: Six Month Follow-Up Audit-Response

Dear Mr. Martin:

Pursuant to s. 20.055(5)(h), Florida Statutes, please find the Parole Commission's Six-Month Post Audit Follow-up Report to Auditor General Report 2013-033, an operation audit of the Restoration of Civil Rights process, Information Technology Controls, Payroll and General Expenditure Processes, and Prior Audit Findings. This audit review period began in July 2010 and ended in February 2012, and the final report was published in November 2012.

While there were no audit findings for Payroll, General Expenditure Processes, or for Prior Audit Findings, and no errors found in the Commission's Restoration of Civil Rights eligibility determinations, there were four (4) findings that pertained to the Clemency process. The Commission, responding on behalf of Ms. Julia McCall, Executive Clemency Coordinator, is pleased to report that all corrective actions have been successfully completed.

Please do not hesitate to call me if you have questions regarding this response.

Sincerely,

Tena M. Pate
Chair

COMMITTED TO PROTECTING THE PUBLIC

OFFICE OF THE CHAIR
4070 ESPLANADE WAY, TALLAHASSEE, FL 32399-2450 • (850) 487-1980
<https://fpc.state.fl.us/>

**FLORIDA PAROLE COMMISSION
SIX MONTH FOLLOW-UP REPORT
TO THE AUDIT FINDINGS FOR
RESTORATION OF CIVIL RIGHTS, INFORMATION TECHNOLOGY CONTROLS, PAYROLL
AND GENERAL EXPENDITURE PROCESSES AUDIT
FOR THE PERIOD BEGINNING JULY 1, 2010 AND ENDING FEBRUARY 28, 2012**

Finding No. 1: Restoration of Civil Rights (RCR) Case Reviews

Finding No. 1:

Although we noted no errors in RCR eligibility determinations for the RCR cases tested, central office reviews of the determinations were not always properly documented.

Recommendation:

We recommend that the Commission monitor compliance with established procedures to ensure that the central office review process is properly administered and documented.

Commission's follow-up Response:

The Commission has taken the following corrective measures as recommended. The Commission's March 2010 RCR Eligibility Investigations' Training Manual was revised on February 9, 2012 to include an update to the RCR Eligibility Review Form to be used by Central Office examiners when documenting their quality assurance eligibility reviews. The form is used both when revisions or additional information are needed and when the investigation is complete and accurate. The Director of the Office of Clemency Investigations or the designee ensures that the Quality Assurance Review form has been completed and is a part of all clemency case files.

Finding No. 2: IT Roles and Responsibilities

Finding No. 2:

The Commission had not established adequate policies and procedures defining the roles, responsibilities, and authority regarding the Management of Application for Clemency (MAC) computer application.

Recommendation:

We recommend that the Commission, in conjunction with the Office of Executive Clemency and the Department, establish adequate policies and procedures defining the roles, responsibilities,

and authority with regard to MAC. Additionally, we recommend that the Agreement be amended to include the Office of Executive Clemency as it is the official custodian of clemency records.

Commission's follow-up Response:

The Commission has taken the following corrective measures as recommended. The Service Level Agreement (SLA) established the IT service terms between the Department and the Commission including the scope and definition of technical services, roles and responsibilities for operational areas, and service level targets. To ensure accountability, the agreement delineates for the Department and the Commission their roles and responsibilities in each service area, including the MAC database. The SLA defines the Commission's authority and ownership of all of the Commission's data and databases, including MAC.

To further define the roles and responsibilities and authority of the MAC database, the Commission has established Procedure Directive 2.01.07. This procedure directive sets forth the scope of functions, activities, and interrelationships of the Commission, the Department, and the Office of Executive Clemency. It acknowledges that the Executive Clemency Coordinator is the custodian of all clemency records. It also includes a requirement that prior to making modifications to the MAC database, or obtaining, changing, or terminating access to the MAC database, approval must be obtained from the Executive Clemency Coordinator or designee.

The SLA has been amended to include the Office of Executive Clemency as the official custodian of clemency records and specifically defines the roles, responsibilities, and authority for the MAC database. Revisions to the SLA have been agreed upon by the Commission, the Department, and the Office of Executive Clemency. The Executive Clemency Coordinator's designee has been set forth in writing and posted on the Commission's website.

Finding No. 3: Change Management Controls

Finding No. 3:

The Commission did not always follow change management control policies and procedures to ensure that the change management processes were appropriate.

Recommendation:

To ensure that the change management process operates appropriately, the Commission should work concurrently with the Office of Executive Clemency and the Department to enhance change management control procedures. Additionally, all parties should take the necessary steps to ensure adherence to the enhanced procedures.

Commission's follow-up Response:

The Commission has taken the following corrective measures as recommended. The Commission and the Department have four (4) procedure directives that establish change

management controls and ensure that change management processes are appropriate. The Commission submits all service requests for modifications to the MAC database through the Service Level Agreement Tracking System (SLATS). In addition, the Commission has established Procedure Directive 2.01.07 acknowledging the Executive Clemency Coordinator as the custodian of all clemency records and includes a requirement that prior to making modifications to the MAC database, approval must be obtained from the Executive Clemency Coordinator or designee

The procedure directive requires all service requests for modifications to the MAC database be submitted by the Executive Clemency Coordinator or designee. It also requires the Executive Clemency Coordinator or designee to be responsible for coordinating, guiding, monitoring, and approving each work order under the service request to ensure the accountability of modifications to the MAC database.

All service requests for modifications to the MAC database are submitted, coordinated, guided, monitored, and approved through the SLATS system by the Executive Clemency Coordinator or designee. The Executive Clemency Coordinator designee is set forth in writing and posted on the Commission's website.

The SLA has been amended to include the Office of Executive Clemency as the official custodian of clemency records, all service requests for modifications to the MAC database must be submitted by the Executive Clemency Coordinator or designee, and the Executive Clemency Coordinator or designee is responsible for coordinating, guiding, monitoring and approving each work order under the service request to make modifications to the MAC database.

Finding No. 4: MAC Access Privileges

Finding No. 4:

The Commission did not ensure that complete MAC access control records were retained, including the dates that access privileges were deactivated.

Recommendation:

The Commission, in conjunction with the Office of Executive Clemency and the Department, should ensure that access control records are retained as required by the General Records Schedule and enhance its practices to ensure its ability to demonstrate that the access privileges of all former employees are deactivated in a timely manner.

Commission's follow-up Response:

The Commission has taken the following corrective measures as recommended. The Commission follows the Department's Procedure Directive 206.007 to prevent unauthorized access and to ensure effective controls for timely deactivation of terminated employees' access privileges to all databases, including the Clemency database (MAC). The Commission submits

database access requests to the Department through a web-based online Security Access Request (SAR).

The Commission submitted a formal request (SLATS) to the Department to program the SAR system to route a SAR to the Executive Clemency Coordinator or designee for approval prior to being routed to the Department's Central Office Information Security Coordinator. The Department has completed the programming to the MAC database.

The Executive Clemency Coordinator has the ability to record the specific date of approval in the SAR system. The Department's Central Office Information Security Coordinator is not permitted to approve the MAC database access without the recorded "date of approval" by the Executive Clemency Coordinator or designee.

A formal request (SLATS) was also submitted to the Department to program the MAC database to automatically record the "date of deactivation" when the Department's Information Technology staff deactivates an employee in the MAC database. The Department has completed the programming to the MAC database.

The Commission's Procedure Directive 2.01.07 and the SLA include approval by the Executive Clemency Coordinator or designee prior to obtaining, changing, or terminating access to the MAC database.

The Commission can demonstrate that access privileges of all former employees are deactivated from the MAC database in a timely manner. The Commission retains the supervisor's request to deactivate the employee's access from the MAC database and the SAR access control records dates of deactivation as required by the *General Records Schedule*.

The Commission has increased the security of MAC database access privileges.