Audit of Records Management

Project #2019-20

August 7, 2020

EXECUTIVE SUMMARY

The Office of Inspector General (OIG) conducts audits of Florida Housing Finance Corporation's (Florida Housing) programs to provide management and other stakeholders with unbiased, timely, and relevant information for use in promoting accountability, stewardship, and efficient operations.

The OIG's Annual Audit Plan for Fiscal Year 2019 included an audit of the Records and Information Management Office (Records Management).

Within the scope of the areas reviewed, this audit disclosed that Florida Housing's Records Management could improve its level of compliance with applicable laws, rules, regulations, and best practices related to records management and it is strongly recommended that the following key areas be improved to further minimize risk exposure:

- implementation of a comprehensive records management policy;
- improve communication, training and guidance for Florida Housing's Records Management Liaisons (RML) for performing records inventories;
- implementation of a consistent and recurring process for performing regular and consistent records inventories and the subsequent updating of the Florida Housing Records Retention Schedule;
- timely disposal of records after their retention period has passed;
- improvement in the accuracy and completeness of records disposal certification documentation;
- appropriateness of user access privileges for OnBase[1];
- implementation of a strategy and process for the transfer of records stored in Florida Housing's various electronic records environments to OnBase; and
- management and use of the quality assurance process for all records migrated into OnBase.

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[1] OnBase is Florida Housing's designated records storage platform and provides tools and capabilities for storing documents, including retention and destruction processes and document repositories (the location where the document is stored), document retrieval and audit logging.

This audit was conducted in accordance with the OIG's Annual Audit Plan for Fiscal Year 2019. After conducting a risk assessment of the program area, the audit scope was finalized to include Records Management's controls, processes, policies and procedures, and related guidance, which were in effect from January 2017 - January 2020. Our sampling scope included archived records that had been reviewed for quality assurance (QA) during the period of January 2005 - January 2020.

The audit objectives were to determine whether the internal controls for Records Management are adequate and compliant with:

- authoritative source requirements and generally accepted best practices;
- inventory process authoritative source requirements and generally accepted best practices;
- retention and disposal process authoritative source requirements and generally accepted best practices; and
- electronic records management process authoritative source requirements and generally accepted best practices.

To achieve these objectives, the OIG reviewed the following documentation, including but not limited to:
- Chapter 119, Public Records Law, Florida Statutes (F.S.);
- Rule Chapter 1B-24.003, General Records Schedule GS1-SL For State and Local Government Agencies, Florida Administrative Code (F.A.C.);
- Rule Chapter 1B-24, Public Records Scheduling and Disposition, F.A.C.;
- Rule Chapter 1B-26.003, Electronic Record Keeping, F.A.C.;
- Rule Chapter 60GG-2.006, Florida Cybersecurity Standards (FCS), F.A.C.;
- Florida Housing, *Records and Information Management Office Procedural Manual*;
- Florida Housing Records Retention Schedule;
- Florida Housing Policy #11.03, *Data Classification*;
- Memorandum of Agreement - Florida Housing and Florida Department of Corrections, Records Disposal Services;
- Florida Department of State, *The Basics of Records Management*;
- Iron Mountain, *Records Management Best Practices Guide*;
- United Kingdom, National Health Service, *Records Management Audit Framework*; and
- Forerunner Recycling Services and Florida Housing, Master Asset Disposal Services Agreement.

Organizationally situated within Florida Housing's Operations Business Unit, Records Management provides guidance to and assists the business units in managing their records lifecycle in order to achieve compliance with authoritative sources,[2] best practices and internal policies and procedures. Records Management is organizationally situated under the Director of Operations and is comprised of the Records and Information Manager (RIM),[3] and six support staff.

Section 119.011, F.S., define public records as:

> all documents, papers, letters, maps, books, tapes, photographs, films, sound recordings, data processing software, or other material, regardless of the physical form, characteristics, or means of transmission, made or received pursuant to law or ordinance or in connection with the transaction of official business by any agency.

The United States Government's National Records and Archives defines records management as the "planning, controlling, directing, organizing, training, promoting, and other managerial activities related to the creation, maintenance and use, and disposition of records. . ."

Most State of Florida agencies are required to follow Chapter 119 F.S. for authoritative records governance which states:

> The Division of Library and Information Services of the Department of State shall adopt rules to establish retention schedules and a disposal process for public records. Each agency shall comply with the rules establishing retention schedules and disposal processes for public records which are adopted by the records and information management program of the division." However, per the legal opinion of Florida Housing's General Counsel, "Florida Housing is not an "agency" as defined in Section 257.36(5), Fla. Stat. To the extent applicable, Florida Housing complies with the requirements of Chapter 119 in regard to records management." The opinion goes on to state that "Florida Housing has…an extensive Document Retention Schedule, based on both state and federal guidelines. This Schedule will be updated as new documents are created within programs, if such documents do not already fall under an existing retention category. Chapter 257, Florida Statutes,[4] does not apply to Florida Housing. As a public corporation created by statute, Florida Housing is a state "agency" only for those purposes specifically designated by the Legislature. (See Section 420.504(2), Fla. Stat.).

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[2] National Archives - According to the life cycle concept, records go through three basic stages: creation (or receipt), maintenance and use, and disposition.
[3] Every agency is required to designate a Records Management Liaison Officer to serve as the primary point of contact between the agency and the Division's Records Management Program (Section 257.36(5)(a), F.S.). The Florida Housing Records and Information Manager is this designee.
[4] "Chapter 257, Florida Statutes, vests in the Division of Library and Information Services the authority to oversee the records management functions of state and local government agencies. Section 257.36(5), F.S., specifies the responsibilities of state and local government agencies: It is the duty of each agency to: (a) Cooperate with the division in complying with the provisions of this chapter and designate a records management liaison officer. (b) Establish and maintain an active and continuing program for the economical and efficient management of records." - Florida Department of State, *The Basics of Records Management.*

However, the audit determined that Florida Housing has implemented most of the DOS records management requirements in order to "comply with the rules establishing retention schedules and disposal processes for public records".

Florida Housing receives, creates, uses, retains and disposes of physical and electronic records within various environments such as email, network drives, SharePoint,[5] ProLink,[6] Procorem[7] and OnBase records storage areas. Florida Housing's official record storage repository is OnBase, which provides tools and capabilities for storing documents, including retention and destruction processes and document repositories (the location where the document is stored) and document retrieval.

One foundational component of an effective records management program is the requirement for a regular and recurring inventory of records including the identification of existing retention schedules or the establishment of new retention schedules that can be applied to those records. According to the DOS *Basics of Records Management Handbook*:

> Retention schedules identify records and establish minimum periods of time for which the records must be retained based on the record's administrative, fiscal, legal, and historical values. Once the minimum retention has been met, disposition of the records is recommended. Disposition may be by physical destruction, transfer to another agency, or in the case of electronic records, erasure.

Florida Housing has developed and implemented a records retention schedule that is primarily based on the records series and retention criteria of the DOS *General Records Schedule, GS1-SL for State and Local Government Agencies (GS1-SL)*. However, some records retention schedule criteria are based on other sources such as Internal Revenue Code and National Records and Archives. A record series, as defined in Rule 1B-24, F.A.C, is:

> a group of related public records arranged under a single filing arrangement or kept together as a unit (physically or intellectually) because they consist of the same form, relate to the same subject, result from the same activity, document a specific type of transaction, or have some other relationship arising from their creation, receipt, or use.

Examples of record series could be personnel files, development project files or accounts payable/receivable files.

Records Life Cycle Process
As Florida Housing receives and creates records during the course of business, the records eventually reach a point in the records lifecycle process where they are migrated into a maintenance/storage phase. It is during this phase that the migration of the records (electronic and hardcopy) into OnBase

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[5] Microsoft SharePoint is a web-based platform used for sharing files and information. It is designed for teams and provides collaboration features, such as project management, messaging, and shared document storage.
[6] ProLink is a web-based software application for affordable housing program functions that provides metrics and activities in origination, tax credit allocation, construction management, asset management, and compliance in a database.
[7] Procorem is a cloud-based tool for collaborative business. Through a secure access portal companies can set up deal rooms, manage compliance activities, perform due diligence, safely share sensitive information with clients and partners.

should take place. A position that is integral to this migration is the Records Management Liaison (RML). Each Florida Housing Program has an employee designated as the RML along with a backup. It is their responsibility to assist Records Management Staff (RMS) with the inventory, storage and retention, and destruction of records created and used by their program as detailed below:

- Paper records that are ready for migration to OnBase, are prepared by the RML and then given to RMS.
- Then they are scanned and uploaded into a quality assurance queue for review, and thereafter into the predesignated OnBase storage area.
- It is also at this time that the paper records should be timely disposed of by shredding.[8]
- However, several business units are still retaining some paper records.
- Once the records are stored electronically, they are to be retained until their retention period has passed.
- Currently, all electronic records stored in OnBase are retained and not disposed.

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OBSERVATIONS AND RECOMMENDATIONS

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Observation 1: Florida Housing does not have a records management policy

The DOS recommends that all agencies "develop and adhere to a formal, written records management policy." The lack of a formal, written records management policy can result in records management requirements not being met or met in an inconsistent, ineffective, and inefficient manner. A formal, written policy will also serve to provide management and staff accountability for the various duties and responsibilities related to records management. Lastly, a formal, written records management policy can further minimize Florida Housing's vulnerability to potential public records litigation and is also a useful tool in training new employees.

The OIG **recommends** that the Records and Information Management Office (Records Management), in coordination with Executive Management and the General Counsel's Office, develop and implement a formalized, comprehensive records management policy.   This policy should incorporate the recommended "common components" from the Florida Department of State's (FDOS) *Basics of Records Management Handbook*.

Observation 2: Records Inventory - Performance, Training, Guidance and Accountability

Florida Housing is not performing regular and consistent records inventories. The FDOS' *Basics of Records Management Handbook* and Florida Housing's *Records and Information Management Office Procedural Manual* state that "an effective records management program requires an inventory of records maintained by an agency and the identification of existing retention schedules or the establishment of new retention schedules that can be applied to those records."   However, Florida

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[8] Florida Housing currently has a contract with the Florida Department of Corrections to "provide recycling services, including but not limited to, pick up, sale and disposal of records, files…"

Housing has not enacted a requirement for business units in conjunction with Records Management to perform a records inventory on a regular and consistent basis. The last enterprise wide records inventory occurred in 2014; and as a result, Florida Housing's Retention Schedule is outdated. This has led to managers expressing concerns with the possible premature disposal of their records based on either an inaccurately designated GS1-SL record series retention criteria or the need to designate a completely different record series retention criteria all together.

The OIG **recommends** that Florida Housing, through a stated policy requirement, initiate consistent and regular records inventories, in conjunction with guidance and assistance from Records Management.

The OIG also **recommends** that Records Management provide training and develop clear and concise documented procedures as to how the RML's are to perform the inventory. This procedure should include:
- the mutual responsibilities between Records Management and the business units; and
- the expected deliverable.

Finally, the OIG **recommends** that the any procedures developed should include the following:
- who has the authority to change, add or delete a records series; and
- the process to change, add or delete a records series.

Observation 3: Records kept past retention periods

The audit determined that many paper and electronic records are being retained beyond retention schedule requirements for the record series. All electronic records stored in OnBase are currently retained indefinitely and are not disposed of after retention schedule requirements are met.

Florida Housing's Records Retention Schedule is based on records series retention period criteria from the:
- General Records Schedule GS1-SL as established by the FDOS;
- Internal Revenue Service (IRS) Code of Federal Regulation;
- National Records and Archives Administration (NARA); and
- internally designated records series retention period criteria (e.g. "Departmental Consensus").

The FDOS *Basics of Records Management Handbook* states:

> Agencies have the discretion to retain records beyond the minimum retention requirements if needed for administrative, legal or other purposes. We highly recommend that agencies dispose of records that have met their retention requirements and are no longer needed and that agencies specify in their records management policies if, as a matter of practice, the agency will retain certain records for a period of time beyond the minimum. Adhering to formalized, consistent records management practices will benefit your agency in the event of litigation.

The FDOS records series criteria designates the length of time the records must be retained. However, when interviewed, several members of Management expressed the following concerns:

- They were reluctant, in certain cases, to timely authorize the disposal of records due to concerns with the accuracy and validity of the current records retention schedule criteria designated for some of the record series, and thus the records themselves.
- Another factor in management's reluctance is the desire to retain, in certain situations, "original" hard copy documentation.
- Certain documents designated as the legal copy of record must be produced in order to satisfy a request for information from an outside entity.
- Not having the legal copy of record can impede, delay or prevent business transactions from being completed.
- This original legal copy of record can be something as singular as a one-page promissory note, within a group of other documents, which make up a larger file.

Records Management staff stated the following:

- Once the business unit provides the records to be stored into OnBase, the original hardcopy should be timely destroyed unless there is a legal justification otherwise.
- If an outside entity requests the original documentation, but without legal justification, then the copy stored in OnBase should legally suffice.
- Adhering to this process will reduce the unnecessary accrual of hard copy records and the physical storage footprint.

The FDOS website[9] states:

- Without properly scheduling and disposing of your records you will not have a professional audit trail that could be beneficial in litigation.
- Your agency may not be trusted to provide for the public's right of access to public records.
- Government employees work in a highly scrutinized environment; the press and public respond quickly to allegations of fraud, abuse or mismanagement.

The business units should have the primary responsibility for determining what records series retention period criteria are appropriate for their records. Therefore, as it relates to the appropriate record series retention period, the OIG **recommends** the following:

- Florida Housing's Records Retention Schedule's be updated by the business processes and with guidance from the Office of the General Counsel and Records Management, to reflect their desired and justified retention period criteria.
- When applicable, retention criteria should be based on GS1-SL retention period criteria; however, if an alternate records retention period criteria is utilized, other than GS1-SL, then the longer retention period shall be followed.

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[9] https://dos.myflorida.com/library-archives/records-management/records-management-faq/#faq-answer12

Observation 4: Migration of records stored in the Florida Housing's various electronic records environments to the designated repository of record - OnBase

The OnBase platform has been designated as the repository of record for Florida Housing as it integrates essential, records management tools and capabilities that are required to maintain the confidentiality, integrity and availability of the records. Currently, there is no defined or documented process in place detailing Florida Housing's requirements and expectations for the timely transfer of records stored in the various electronic records storage environments to OnBase. The FDOS GS1-SL states:

> Agency records retention schedules apply to records regardless of their physical format. Therefore, records created or maintained in electronic format must be retained in accordance with the minimum retention requirements presented in these schedules, whether the electronic records are the record copy or duplicates.

Furthermore, the FDOS' *Basics of Records Management Handbook* recommends that the "agency integrates management of electronic records, including e-mail and other "born digital" records, into its overall records management program and procedures."

Including OnBase, Florida Housing's various electronic records storage environments are the network drives, SharePoint, Outlook, Microsoft Teams and the ProLink/Procorem platform. Some of these environments are either relatively new or only recently utilized enterprise wide. For example, SharePoint was deployed on Florida Housing's network approximately 7-8 years ago. However, widespread adoption by staff has occurred only in the last 2-3 years, with the mandate that all business units migrate their data to and utilize SharePoint. Furthermore, Florida Housing's ProLink/Procorem platform recently went live only in November 2019. Records that are housed in this platform have not reached a point in the records lifecycle where they are ready to be migrated into the maintenance, storage phase in OnBase.

At a certain point in the records retention lifecycle, records should be migrated from their current environments to OnBase following specific and documented requirements. A central records repository like OnBase improves the quality of maintenance and administration of the records, including search and retrieve capabilities and accountability through audit logs captured when activity is initiated on the record.

The OIG **recommends** that Florida Housing establish a defined and documented process stating the requirements and expectations for the timely transfer of records stored in the various electronic records storage environments to OnBase.

Observation 5: Inadequate disposal certification documentation

When Florida Housing records are disposed of, a "Disposal Certification Form" documenting the specifics of the disposal is to be completed by the RML. This is done to provide validation that the disposal was done according to and in compliance with FDOS requirements. Copies of these forms are

stored in OnBase. The OIG randomly sampled 20 Disposal Certification Forms from OnBase to determine whether, prior to disposal and per GS1-SL and Records Management internal requirements that, for each record series being disposed of, agencies shall identify and document the following:

1. Records retention schedule number;
2. Item number;
3. Record series title;
4. Inclusive dates of the records;
5. Volume in cubic feet for paper records; for electronic records, record the number of bytes and/or records and/or files if known, or indicate that the disposed records were in electronic form; and
6. Disposition action (manner of disposition) and date.

The OIG observed that, in some instances, the Disposal Certification Forms were not being filled out completely or correctly with the requirements above. Due to the inability to establish what associated record series and retention period criteria applied to the record, the OIG was unable to determine whether the record was disposed of correctly. It was also noted that there was no formalized training completed or no formal training program for the RMLs, which could have contributed to the errors in completion of Disposal Certification Forms.

The OIG **recommends** the RIM develop requirements for guidance, accountability and training in completing the Disposal Certification Forms correctly with only the RIM accepting and signing off on the Disposal Certification Forms.

Observation 6: Appropriateness of OnBase access privileges

The OIG review of user accounts in the *OnBase User Groups & Rights* document determined that many users have access privileges that go beyond the control principle of least privilege. This control principle states that a user should only be granted enough access privileges required to perform their job.

The Florida Cybersecurity Standards[10] requires that "all workers be granted access to agency IT resources based on the principles of "least privilege" and "need to know determination." As part of the 2016 Auditor General's operational audit[11] of Florida Housing, a finding was rendered regarding appropriate access level privileges in OnBase: "Corporation controls for reviewing the appropriateness of . . .OnBase . . . user access privileges need enhancement" and recommended that "Corporation management establish procedures requiring the conduct of periodic reviews of the appropriateness of. . . OnBase . . . user access."

However, the OIG's review of the current levels of access concluded that user access privileges to OnBase are still in need of enhancements.

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[10] This rule establishes cybersecurity standards for information technology (IT) resources. These standards are documented in rules 60GG-2.001 through 60GG-2.006, F.A.C. State Agencies must comply with these standards in the management and operation of state IT resources.
[11] State of Florida Auditor General (AG) - Operational Audit of Florida Housing Report No. 2017-047

In order to address the need to only assign current users enough access privileges to perform their required job, the OIG **recommends** that the *OnBase User Groups & Rights* be updated to reflect appropriate user access privileges based on the principles of "least privilege" and "need to know determination" and then reassign current OnBase users accordingly.

The OIG also **recommends** developing a process to assign new OnBase users to the appropriate access privileges based on the principles of "least privilege" and "need to know determination" and for existing users when the "employee is placed in another position or job duties change."

Observation 7: Management and use of the quality assurance process

Migration of some records into OnBase are done outside of the purview of Records Management and the quality assurance (QA) process as many users have the ability to scan, upload and store paper documents and "drag and drop" electronic documents into OnBase. In the "Quality Assurance" section of the *Florida Housing Records and Information Management Office Procedural Manual - Internal Policy and Procedure*, it is stated that quality assurance is "an optional…measure".

This could result in documents not being stored in the correct location and the increased potential for issues with the documents legibility or completeness as they are not reviewed under the Records Management QA process.

The OIG **recommends** that the ability to migrate electronic and paper record documentation into OnBase be limited only to the RIMS. This will promote consistency in the way the process is performed and provide better accountability by placing this capability in fewer hands. Additionally, this requirement should be added to the recommended records management policy.

ACKNOWLEDGEMENT

The Office of Inspector General would like to extend our appreciation to the management and staff of Florida Housing's Records Management Process for their assistance and cooperation during this audit.

The following are issues that did not rise to the level of an Observation and therefore do not contain a suggested recommendation or require the auditee to propose a corrective action. However, they were noted during the course of the audit:

- In several locations throughout Florida Housing's offices there are receptacles for leaving records for disposal. "Shred-it"[12] is contracted by Florida Housing to remove these documents from the receptacles on a consistent basis and then dispose of them by shredding. The RIM had expressed concern about not knowing what records staff were putting in the receptacles and that some of the records might need to be retained.

- Staff is not always timely returning paper files to their appropriate physical storage location. During the course of the audit there was at least one instance where a record could not be located by staff. After a time-consuming effort, the record was located in an employee's office where it had been for quite some time. Furthermore, many record files were observed to be placed in a disorganized manner on the floor or on top of file cabinets in several records storage areas, instead of being returned to their proper location.

- It was communicated to the auditor that there had been several instances where new updates, amendments or addendums to existing records stored in OnBase were never uploaded. This delayed efforts to complete the business transaction until the current document could be located.

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[12] Shred-it is a leading information security service provided by Stericycle, Inc. and is the largest document destruction provider in the world. https://www.shredit.com/en-us/about

Observation 1: Florida Housing does not have a records management policy

The OIG **recommends** that the Records and Information Management Office (Records Management), in coordination with Executive Management and the General Counsel's Office, develop and implement a formalized, comprehensive records management policy. This policy should incorporate the recommended "common components" from the Florida Department of State's (FDOS) *Basics of Records Management Handbook*.

Response to the Recommendation

We concur with the recommendation above and will work with the General Counsel's office and Executive Management team to develop a draft Records Management Policy by September 30, 2020.

Observation 2: Records Inventory - Performance, Training, Guidance and Accountability

The OIG **recommends** that Florida Housing, through a stated policy requirement, initiate consistent and regular records inventories, in conjunction with guidance and assistance from Records Management.

The OIG also **recommends** that Records Management provide training and develop clear and concise documented procedures as to how the RML's are to perform the inventory. This procedure should include:
- the mutual responsibilities between Records Management and the business units; and
- the expected deliverable.

Finally, the OIG **recommends** that the any procedures developed should include the following:
- who has the authority to change, add or delete a records series; and
- the process to change, add or delete a records series.

Response to the First Recommendation

We concur with this recommendation and will include it in the draft policy mentioned above.

Response to the Second Recommendation

We concur with this recommendation and will work with the Records Management Liaisons to develop clear and concise procedures outlining how to complete a records inventory, including the expected deliverables. A draft of these procedures will be completed by September 30, 2020.

Response to the Third Recommendation

We concur with this recommendation and will specify in the Records Management procedures who has authority and what the process is to change, add, or delete records series from the Corporation's Records Retention Schedule. A draft of these procedures will be completed by September 30, 2020.

Ron DeSantis, Governor

Board of Directors: Ron Lieberman, Chairman O Ray Dubuque, Vice Chairman
Ryan Benson O Sandra Einhorn O LaTasha Green-Cobb
Bill Gulliford O Ken Lawson

Harold "Trey" Price, Executive Director

Observation 3: Records kept past retention periods

The business units should have the primary responsibility for determining what records series retention period criteria are appropriate for their records. Therefore, as it relates to the appropriate record series retention period, the OIG **recommends** the following:

- Florida Housing's Records Retention Schedule's be updated by the business processes and with guidance from the Office of the General Counsel and Records Management, to reflect their desired and justified retention period criteria.
- When applicable, retention criteria should be based on GS1-SL retention period criteria; however, if an alternate records retention period criteria is utilized, other than GS1-SL, then the longer retention period shall be followed.

Response to the Recommendation

We concur with this recommendation and will offer the necessary support and guidance the business units need to update their records series in the Corporation's Records Retention Schedule. This will include guidance from Records Management and the General Counsel's Office to help the business unit's reflect their desired and justified retention period criteria. In line with our current retention schedule, retention criteria should be based on GS1-SL retention period criteria; however, if an alternate records retention period criteria is utilized, other than GS1-SL, then the longer retention period shall be followed.

Observation 4: Migration of records stored in the Florida Housing's various electronic records environments to the designated repository of record - OnBase

The OIG **recommends** that Florida Housing establish a defined and documented process stating the requirements and expectations for the timely transfer of records stored in the various electronic records storage environments to OnBase.

Response to the Recommendation

We concur with this recommendation and will include this information in the Records Management Policy mentioned above.

Observation 5: Inadequate disposal certification documentation

The OIG **recommends** the RIM develop requirements for guidance, accountability and training in completing the Disposal Certification Forms correctly with only the RIM accepting and signing off on the Disposal Certification Forms.

Response to the Recommendation

We concur with this recommendation and will provide additional training to both Records Management staff and well as the Records Management Liaisons on the correct completion of the disposition forms. This will be completed by September 30, 2020. We will also ensure that any new Records Management Liaisons will receive training within 30 days of joining the RML group.

Observation 6: Appropriateness of OnBase access privileges

In order to address the need to only assign current users enough access privileges to perform their required job, the OIG **recommends** that the *OnBase User Groups & Rights* be updated to reflect appropriate user access privileges based on the principles of "least privilege" and "need to know determination" and then reassign current OnBase users accordingly.

The OIG also **recommends** developing a process to assign new OnBase users to the appropriate access privileges based on the principles of "least privilege" and "need to know determination" and for existing users when the "employee is placed in another position or job duties change."

Response to the First Recommendation

We concur with this recommendation and have begun the following steps, which will be completed by September 30, 2020:
1. **Pull a report from OnBase to determine each user's access privileges**
2. **Change all users who are not part of the Records Management staff to "view only" access**
3. **Develop a process for users who are not part of Records Management staff to request access above "view only" that requires the Records Manager and staff's senior manager approval**

Response to the Second Recommendation

We concur and new users will be included in the process outlined in #3 in the response above.

Observation 7: Management and use of the quality assurance process

The OIG **recommends** that the ability to migrate electronic and paper record documentation into OnBase be limited only to the RIMS. This will promote consistency in the way the process is performed and provide better accountability by placing this capability in fewer hands. Additionally, this requirement should be added to the recommended records management policy.

Response to the Recommendation

We concur with this recommendation and will include this information in the Records Management Policy as well as the OnBase access level procedures mentioned in the Observation #6 response above.

Ron DeSantis, Governor

Board of Directors: Ron Lieberman, Chairman O Ray Dubuque, Vice Chairman
Ryan Benson O Sandra Einhorn O LaTasha Green-Cobb
Bill Gulliford O Ken Lawson

Harold "Trey" Price, Executive Director