



PAT FRANK  
Clerk of the Circuit Court  
13th Judicial Circuit

**COUNTY AUDIT**

**HILLSBOROUGH COUNTY, FLORIDA**

**ONBASE DOCUMENT RETENTION FOLLOW-UP**

**REPORT # 246**

**MARCH 28, 2013**

## MEMORANDUM

DATE: March 28, 2013

TO: Pat Frank, Clerk of the Circuit Court

FROM: Peggy Caskey, CIA, CISA, CFE  
Director, County Audit

SUBJECT: Follow-up to Audit Report #220

County Audit performed a follow up of the OnBase Document Retention System Audit Report #220, dated August 18, 2011. Based on the follow-up audit work and discussions with management, the Audit Team is closing three of the original audit concerns. The review indicates that these concerns have been addressed and corrective changes have been implemented. The other seven original concerns remain open (five findings and two observations). The report on the follow-up audit is enclosed.

County Audit appreciates the cooperation and professional courtesies extended to the Audit Team by the personnel of County Finance, Systems Support, and Clerk IT during this follow-up audit.

c: Dan Klein, Chief Deputy Clerk to the Board  
Tim Simon, Director, County Finance  
Idania Alfonso, Manager, Clerk IT Operations  
Mary Strommer, Director, Systems Support

## STATUS OF ORIGINAL AUDIT CONCERNS

The table below summarizes the original audit concerns at the completion of the follow-up audit.

For reference purposes, the original audit report can be viewed on the Clerk's web site at <http://www.hillsclerk.com> under Clerk Services, County Audit – Recent Reports, #220, issued Fiscal Year 2011, 08/18/2011.

	<b>DESCRIPTION OF ORIGINAL CONCERNS</b>	<b>Status</b>	<b>Follow-Up Audit Comments</b>
<i>FINDINGS: COUNTY FINANCE</i>			
1	Electronic records may not be properly destroyed in OnBase.	OPEN	The records management module cannot be fully implemented until the auto redaction is in place.
2	Health Insurance Portability and Accountability Act (HIPAA) data is stored in OnBase.	OPEN	Please read the audit comment on page 3 of this report.
3	OnBase documentation is not electronically approved by Department management within OnBase.	OPEN	The process of developing departmental internal approvals has been initiated in conjunction with Clerk IT.
4	Oversight of payment processing documentation needs improvement.	CLOSED	When errors are noted, County Finance continues to hold formal and ad hoc training with payment processing staff. Follow up testing was conducted for this item and no exceptions were noted.
5	The approval process for Electronic Funds Transfer (EFT) requests needs improvement.	CLOSED	County Finance has an approval process in place to sufficiently control EFT requests.
6	Some personal banking information was not redacted in OnBase.	OPEN	Please read the audit comment on page 3 of this report.
7	Payment processing time cannot be efficiently tracked in OnBase.	CLOSED	County Finance tracks several key performance measures and continues to partner with the OnBase vendor to expand reporting capabilities.

	<b>DESCRIPTION OF ORIGINAL AUDIT COMMENTS</b>	<b>Status</b>	<b>Comments</b>
<b><i>FINDINGS: SYSTEMS SUPPORT</i></b>			
8	Granting access to OnBase needs to be improved.	OPEN	System Support has made several improvements which enhanced the controls associated with granting access to OnBase. These improvements are anticipated to be implemented during FY13.
<b><i>OBSERVATIONS: CLERK'S OFFICE</i></b>			
1	OnBase does not have adequate disaster recovery (DR) resources.	OPEN	Clerk IT is currently evaluating available solutions and, once selected, anticipates implementation to take approximately 12 months.
2	Multiple Document Repositories exist within the Clerk's Office.	OPEN	The feasibility of using OnBase as the Clerk-Wide document retention system is being evaluated.

NOTE: An Open Audit Comment is defined as a control weakness that management has not yet implemented corrective action that will alleviate the original concern and a Closed Audit Comment is a control weakness for which management's corrective action has alleviated the original concern.

## **FOLLOW-UP COMMENT, RECOMMENDATION, AND CLIENT RESPONSE**

The following comment discusses the additional exceptions noted during follow-up testing.

Note: The Client's response is included verbatim and in *italics*.

### **FOLLOW-UP COMMENT**

**Finding 2 - Health Insurance Portability and Accountability Act (HIPAA) data is stored in OnBase.**

**Finding 6 - Some personal banking information was not redacted in OnBase.**

Management's goal is to redact protected information from electronic documents stored in OnBase. In September 2011, management completed its manual process of redacting protected information from records that were created prior to April 2011. Management directed staff to redact information from documents created after April 2011 during payment processing.

To assess the level of accomplishment, the Audit Team tested a judgmental sample of 100 OnBase documents from January 2011 and January 2012 that had gone through the redaction process. Test results indicate that the redaction goal has not yet been fully accomplished. During fieldwork, the Audit Team provided management with a list of the noted exceptions.

### **RECOMMENDATION:**

Consideration should be given to enhancing the redaction process to ensure that management's goal of redacting protected information from electronic documents stored in OnBase is fully accomplished.

### **CLIENT RESPONSE:**

*Concur*

### **CORRECTIVE ACTION PLAN:**

*Clerks have been reminded to be more mindful of the documents they are processing and to ensure that redaction is properly performed. In addition, supervisors have been tasked to spend a portion of their day random sampling processed documents to ensure that redaction is being performed.*

### **TARGET COMPLETION DATE:**

*Immediate*

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