

**FISH AND WILDLIFE CONSERVATION  
COMMISSION**

**REVENUE COLLECTION PROCESSES  
AND SELECTED ADMINISTRATIVE ACTIVITIES**

---

**Operational Audit**



## **THE FISH AND WILDLIFE CONSERVATION COMMISSION**

Pursuant to Section 20.331, Florida Statutes, the head of the Fish and Wildlife Conservation Commission is the Commission, with Commissioners appointed for 5-year terms by the Governor as provided by Article IV, Section 9 of the State Constitution. The Commissioners who served during the period of our audit were:

Richard A. Corbett, Chair from July 2013  
Kenneth Wright, Chair through June 2013  
Kathy Barco  
Ronald M. Bergeron

Aliese P. Priddy  
Adrien Bo Rivard  
Charles W. Roberts III  
Brian S. Yablonski

### **EXECUTIVE DIRECTOR OF THE FISH AND WILDLIFE CONSERVATION COMMISSION**

The Executive Director is employed by the Commission and serves at the pleasure of the Commission. Nick Wiley served as Executive Director during the period of our audit.

The audit team leader was Suzanne Sullenberger, CPA, and the audit was supervised by David R. Vick, CPA. Please address inquiries regarding this report to David R. Vick, CPA, Audit Manager, by e-mail at [davidvick@aud.state.fl.us](mailto:davidvick@aud.state.fl.us) or by telephone at (850) 412-2817.

This report and other reports prepared by the Auditor General can be obtained on our Web site at [www.myflorida.com/audgen](http://www.myflorida.com/audgen); by telephone at (850) 412-2722; or by mail at G74 Claude Pepper Building, 111 West Madison Street, Tallahassee, Florida 32399-1450.

# FISH AND WILDLIFE CONSERVATION COMMISSION

## Revenue Collection Processes and Selected Administrative Activities

### SUMMARY

This operational audit of the Fish and Wildlife Conservation Commission (Commission) focused on revenue collection processes and selected administrative activities. The audit also included a follow-up on the findings noted in our report No. 2011-188. Our audit disclosed the following:

#### RECREATIONAL AND COMMERCIAL LICENSING AND PERMITTING

**Finding No. 1:** The Commission had not allocated to the State Game and Marine Resources Conservation Trust Funds the 2011-12 and 2012-13 fiscal years' interest earnings associated with the proceeds from the sale of 5-year licenses and permits.

**Finding No. 2:** The Commission had not established policies and procedures for the collection and use of social security numbers. In addition, the Commission did not always provide a written notification regarding the purpose for collecting the number to each individual whose social security number was collected.

#### FIELD OFFICE REVENUE COLLECTIONS

**Finding No. 3:** The Commission did not always ensure that employees responsible for handling cash and checks received required background screenings.

**Finding No. 4:** Controls over daily-use permit fees collected at iron rangers<sup>1</sup> located in Commission management areas could be improved.

#### SELECTED ADMINISTRATIVE ACTIVITIES

**Finding No. 5:** As similarly noted in our report No. 2011-188, information technology user access privileges to Commission network and revenue systems were not always timely deactivated upon an employee's separation from Commission employment.

**Finding No. 6:** As similarly noted in our report No. 2011-188, Florida Accounting Information Resource Subsystem user access privileges were not always timely deactivated upon an employee's separation from Commission employment.

**Finding No. 7:** Commission staff did not always timely cancel purchasing cards upon a cardholder's separation from Commission employment.

**Finding No. 8:** As similarly noted in our report No. 2011-188, Commission staff did not always follow Commission procedures for reporting missing tangible personal property items.

### BACKGROUND

The State Constitution<sup>2</sup> specifies that the Fish and Wildlife Conservation Commission (Commission) is responsible for exercising regulatory and executive powers with respect to wild animal life, freshwater aquatic life, and marine life. In executing its duties, the Commission receives revenue from various sources, including license and permit sales, land leases, timber sales, and other revenue-producing agreements. As of February 2014, the Commission's organizational structure included the Divisions of Freshwater Fisheries Management, Habitat and Species Conservation, Hunting and Game Management, Law Enforcement, and Marine Fisheries Management; the Fish and Wildlife Research Institute; and various administrative offices, including the Office of Licensing and Permitting.

<sup>1</sup> Iron rangers are unmanned collection stations used by the Commission to collect fees at fish and wildlife management areas.

<sup>2</sup> Article IV, Section 9 of the State Constitution.

---



---

## FINDINGS AND RECOMMENDATIONS

---

### Recreational and Commercial Licensing and Permitting

The Office of Licensing and Permitting (OLP) provides a coordinated point of contact for customers to obtain all the recreational and commercial licenses and permits issued by the Commission. During the period July 2012 through February 2014, recreational and commercial licensing and permitting revenue totaled approximately \$82.2 million. State law specifies the trust funds in which various Commission revenues, including proceeds from the sale of licenses and permits, are to be recorded.

---

#### **Finding No. 1: Dedicated License Trust Fund**

---

State law<sup>3</sup> establishes the Dedicated License Trust Fund as the fund to be credited with moneys collected for resident 5-year hunting and fishing licenses and permits and replacement 5-year licenses.<sup>4</sup> State law also provides that:

- One-fifth of the total proceeds from the sale of 5-year hunting and freshwater fishing licenses, permits, and replacement licenses, and all interest earnings derived from investment of the total proceeds of such sales, are to be appropriated annually to the State Game Trust Fund.
- One-fifth of the total proceeds from the sale of 5-year saltwater fishing licenses, permits, and replacement licenses, and all interest earnings derived from investment of the total proceeds of such sales, are to be appropriated annually to the Marine Resources Conservation Trust Fund.

In our report No. 2011-188, finding No. 3, we noted that Commission procedures did not require the allocation of interest earnings to be based on the total cumulative invested proceeds from the sales of licenses and permits. In response to our audit, the Commission revised its procedures, effective for the 2010-11 fiscal year, to calculate and allocate interest earnings annually based on the 5 most-recent fiscal years' revenues from the sale of 5-year licenses and permits.

As part of our audit follow-up procedures, we evaluated whether Commission staff calculated the amounts to be transferred or apportioned to the State Game and Marine Resources Conservation Trust Funds as specified by State law and in accordance with Commission procedures. We discovered that, as of June 2014, Commission staff had not allocated the 2011-12 and 2012-13 fiscal years' interest earnings totaling \$232,912. Subsequent to our audit inquiry, Commission staff allocated interest earnings totaling \$218,375 (\$47,005 to the State Game Trust Fund and \$171,370 to the Marine Resources Conservation Trust Fund) on July 7, 2014, resulting in an under allocation to the Trust Funds of \$14,537 (\$3,072 and \$11,465, respectively). Subsequent to our further audit inquiry, Commission staff correctly allocated the interest earnings for the 2011-12 and 2012-13 fiscal years.

In response to our audit inquiries, Commission staff indicated that the interest earnings allocations had not been made due to a management oversight and that the allocation errors were caused by using interim interest earnings rather than the amounts at fiscal year-end.

Timely and accurate allocations of interest earnings are necessary to ensure that State trust funds receive the amounts designated by, and to demonstrate Commission compliance with, State law.

---



---

**Recommendation: We recommend that Commission management ensure that interest earnings on 5-year license and permit sale proceeds are allocated timely, accurately, and in accordance with State law.**

---



---

<sup>3</sup> Section 379.203, Florida Statutes.

<sup>4</sup> Section 379.354(9), Florida Statutes.

---

**Finding No. 2: Collection of Social Security Numbers**

---

The Legislature has acknowledged in State law<sup>5</sup> that a person's social security number (SSN) was never intended to be used for business purposes. However, over time the SSN has been extensively used for identity verification and other legitimate consensual purposes.

Recognizing that an SSN can be used to perpetrate fraud against an individual and acquire sensitive personal, financial, medical, and familial information, the Legislature specified that State agencies may not collect an individual's SSN unless the agency is authorized by law to do so or it is imperative for the performance of that agency's duties and responsibilities as prescribed by law.<sup>6</sup> Additionally, State agencies are required to provide written notification regarding the purpose for collecting the SSN to each individual whose SSN is collected. The SSNs collected may not be used by the agency for any purpose other than the purpose provided in the written notification. State law further provides that SSNs held by an agency are confidential and exempt from public inspection and requires each agency to review its SSN collection activities to ensure the agency's compliance with the requirements of State law and immediately discontinue SSN collection upon discovery of noncompliance.

During the period July 1, 2012, through February 28, 2014, the Commission required individuals to provide their SSNs for a large number of Commission-issued licenses and permits, including 101 Alligator Farming Licenses, 12 Alligator Processing Facility Permits, 54 No-Cost Alligator Processing Facility Permits, 6,660 Commercial Saltwater Retail Licenses, and 3,792 Commercial Wholesale Dealer Licenses. We noted that, although the Commission had not adopted written policies and procedures relating to the collection and use of SSNs, it was the OLP's practice to include a written notification regarding the purpose for collecting the SSN on certain license and permit application forms requiring the collection of an individual's SSN. In April 2014, in response to our audit inquiry, Commission management indicated that the OLP had reviewed all its forms, including those available on the Commission Web site and the preprinted renewal forms mailed to existing customers, and planned to update the applicable forms with the required SSN collection notifications as soon as possible.

As part of our audit, we reviewed selected application and renewal forms, including those available on the Commission's Web site, to determine whether the forms had been timely updated to include the required SSN collection notification. We found that, as of July 15, 2014, application forms available on the Commission Web site for Alligator Farming Licenses, Alligator Processing Facility Permits, No-Cost Alligator Processing Facility Permits, Commercial Saltwater Retail Licenses, and Commercial Wholesale Dealer Licenses did not include the required SSN collection notification. In addition, the preprinted Saltwater Wholesale Dealer License Renewal Statement did not include the required notification.

As of September 8, 2014, the Commission had identified 84 OLP forms that collected SSNs. In response to our audit inquiry, Commission management indicated that they were working to add the notification to the application forms, and continuing to review which forms needed the required notification added.

Effective controls, including written policies and procedures addressing the Commission's collection and use of individuals' SSNs, would better ensure compliance with statutory requirements and reduce the risk that the SSNs may be utilized for unauthorized purposes.

---

<sup>5</sup> Section 119.071(5), Florida Statutes.

<sup>6</sup> Section 119.071(5)(a)2.a., Florida Statutes.

**Recommendation:** We recommend that Commission management establish written policies and procedures regarding the collection and use of individual's SSNs and continue efforts to ensure that individuals are provided written notification, as required by State law, of the Commission's purpose for collecting SSNs.

### Field Office Revenue Collections

Pursuant to State law<sup>7</sup> and Commission rules,<sup>8</sup> Commission staff collected various revenues in Commission field office locations. These collections included daily-use permit fees at seven wildlife management areas (WMAs)<sup>9</sup> and the Tenoroc Fish Management Area (FMA), tag fees for sale of Lake Okeechobee game fish, and registration fees for the Ocala Youth Camp.

According to Commission records, field office collections during the period July 2012 through February 2014 totaled \$668,076. The field offices' payment and fee collection procedures varied, for example:

- Customers placed payments for daily-use permits in an envelope and dropped the envelope into an insert at the unmanned collection station referred to as an "iron ranger" located at the entrances of the seven WMAs. WMA iron ranger collections totaled \$352,134.
- Payments for daily use permit fees collected at the Tenoroc FMA totaled \$59,007. These fees were primarily collected by Commission staff; however, the fees also included daily-use permit fees totaling \$937 collected at an iron ranger located in the FMA.
- Lake Okeechobee Game Fish Tag fees collected by the Commission, Division of Freshwater Fisheries Management, totaled \$41,000. These tags could only be purchased by permitted Lake Okeechobee haul seiners with an active Tagging Agreement.
- Registration fees collected for the Ocala Youth Camp totaled \$215,935. Campers mailed these fees, along with their registration, to the Commission's e Ocala Conservation Center.

Effective internal controls for revenue collections are necessary to ensure that collections comply with State laws and rules and are adequately safeguarded, properly accounted for, timely deposited, and accurately recorded. Such controls should be implemented consistently at each point of collection and include, but not be limited to, appropriate background checks for staff receiving and handling payments and fees and written procedures to ensure the proper safeguard and collection of fees authorized by State laws and rules.

### **Finding No. 3: Background Screenings**

State law<sup>10</sup> requires each State agency to designate those positions that, because of the special trust, responsibility, or sensitive location, require a level 2 background screening<sup>11</sup> as a condition of employment and continued employment. The Commission established policies and procedures<sup>12</sup> requiring that a background screening, including appropriate fingerprinting, be completed prior to or within the first 30 days of employment for selected positions. Among the

<sup>7</sup> Sections 379.354(8) and 379.377, Florida Statutes.

<sup>8</sup> Commission Rules 68A-9.007(4) and 68A-23.012, Florida Administrative Code.

<sup>9</sup> Andrews, Chassahowitzka, Fred C. Babcock/Cecil Webb, J.W. Corbett, Hilochee (Lake County only), Three Lakes, and Tosohatchee WMAs.

<sup>10</sup> Section 110.1127(2)(a), Florida Statutes.

<sup>11</sup> As defined in Section 435.04, Florida Statutes, a level 2 background screening includes, but need not be limited to, fingerprinting for Statewide criminal history records checks through the Department of Law Enforcement, national criminal history records checks through the Federal Bureau of Investigation, and may include local criminal history records checks through local law enforcement agencies.

<sup>12</sup> Commission Policy and Procedure Section 6.46, *Employee Criminal History Check*.

positions specified were those that had access to cash, checks, or credit card information provided to the Commission. Commission procedures also provided that:

- A Division or Office Director could request individual positions be added to the required list of positions subject to background screenings. For such positions, the Director was to provide, in writing to the Office of Human Resources, the position number, position title, and statutory criteria (special trust, responsibility, or sensitive location) applicable to the position.
- The Assistant Executive Director's approval was required to add positions to the background screenings list.
- The Office of Human Resources was to maintain the record of positions added to the background screening list and was also responsible for flagging in People First<sup>13</sup> all the positions requiring a background screening.

As a part of our audit, we identified 36 field office employees who had access to cash and checks received by the Commission during the period July 2012 through February 2014. These employees collected various fees including daily-use permit fees, fish tag fees, and Ocala Youth Camp registration fees. However, our examination of Commission and People First records disclosed that for 29 of the 36 employees, Office of Human Resource staff had not flagged the employees' positions in People First to indicate that the positions required a background screening and, consequently, the required screenings had not been performed. In response to our audit inquiry, Commission management indicated that for 17 of the 29 employees, the Commission had not flagged the employees' positions in People First because the Commission previously exempted employees hired on or before July 15, 2008, from required background screenings, unless the employee had subsequently transferred to a different position. Commission management also indicated that they planned to conduct background screenings on all applicable field office employees, including those hired on or before July 15, 2008, and that all 29 employees had been fingerprinted as of August 25, 2014.

Absent required background screenings for employees with access to cash and checks received by the Commission, there is an increased risk that persons with inappropriate backgrounds will have access to Commission assets.

---

**Recommendation:** We recommend that Commission management ensure that required background screenings are completed for employees in designated positions of special trust, responsibility, or sensitive location.

---



---

#### **Finding No. 4: Iron Ranger Collections**

---

Commission rules<sup>14</sup> established various short-term permits and fees for activities in its management areas. For example, a daily-use permit fee for outdoor recreational activities other than hunting in six<sup>15</sup> of the Commission's seven WMAs charging fees was \$3 per person, or \$6 per non-commercial vehicle. The Tenoroc FMA daily-use permit fee was \$3 per person, and the daily-use permit fee for the Tosohatchee WMA was \$4 per person.

The Commission, Division of Habitat and Species Conservation, managed the WMAs, and the Division of Freshwater Fisheries Management managed the Tenoroc FMA. The Division of Habitat and Species Conservation established written procedures for the collection and deposit of daily-use permit fees received at iron rangers located in the WMAs. The established procedures, effective October 2006, specified that:

---

<sup>13</sup> People First is a Web-based, self-service personnel information system utilized by employees, managers, human resource professionals, and retirees to manage most of the State's human resource functions.

<sup>14</sup> Commission Rule 68A-9.007(4), Florida Administrative Code.

<sup>15</sup> Applicable to the Andrews, Chassahowitzka, Fred C. Babcock/Cecil M. Webb, J.W. Corbett, Hilochee (Lake County only) and Three Lakes WMAs.

- Collections were to be made on a weekly basis, except at two WMAs where collections were to be made monthly and quarterly, respectively.
- The iron ranger was to have a replaceable insert where the daily-use permit envelopes were deposited. The trap door of each insert was to be sealed with a numbered lockable seal.
- The numbered lockable seal was to be removed from the insert in the presence of two employees.
- Both employees were to remove the contents from the insert and complete the *Iron Ranger Daily-Use Permit Accounting Sheet (Accounting Sheet)* by recording required information, including the name of the WMA, iron ranger number, lockable seal number on insert, and total amount of cash and checks collected.
- Both employees were to print and sign their names, along with the date, on the *Accounting Sheet*.

Our examination of Commission procedures and records related to fees collected at iron rangers located in the seven WMAs disclosed that:

- During the period July 2012 through February 2014, the Commission charged \$3 per non-commercial vehicle for a daily-use permit for all outdoor recreational activities other than hunting at the Tosohatchee WMA, rather than the \$4 per person fee specified in Commission rules.<sup>16</sup> According to Commission records, fees collected at two iron rangers located in the Tosohatchee WMA during this period totaled \$29,166.

In response to our audit inquiry, Commission management indicated that a daily-use permit fee of \$3 per non-commercial vehicle had been collected since 2006 when management of the Tosohatchee WMA was transferred from the Department of Environmental Protection to the Commission. Commission management also indicated that field staff had printed \$3 per vehicle on the daily-use permit envelopes rather than \$4 per person due to a miscommunication.

- At the Chassahowitzka WMA, the iron ranger inserts were not opened in the presence of two employees. In response to our audit inquiries, Commission personnel at the Chassahowitzka and Three Lakes WMAs indicated that they were unaware of the Commission's written procedures for the collection of daily-use permit fees at iron rangers; however, we noted that the procedures were available on the Commission's Web site.
- The process to be used to account for the lockable seal numbers was not addressed in Commission procedures and the WMAs used varied processes. For example, at the Andrews, Fred C. Babcock/Cecil Webb, Chassahowitzka, and J.W. Corbett WMAs, the lockable seal numbers were not used in sequential order. While no compensating controls were identified at the Andrews and Chassahowitzka WMAs, Commission staff indicated that compensating controls, including recording the lockable seal number on the *Accounting Sheet* prior to placing the insert at the iron ranger and verifying the number the following week when the receipts were collected, had been implemented at the Fred C. Babcock/Cecil Webb and J.W. Corbett WMAs. However, we found that:
  - At the Fred C. Babcock/Cecil Webb WMA, Commission personnel were to record the lockable seal number on, and initial, the *Accounting Sheet* prior to placing the insert at the iron ranger and then retrieve and complete the *Accounting Sheet* when the receipts were collected the following week. However, 9 of the 28 *Accounting Sheets* we selected for examination were not initialed.
  - At the J.W. Corbett WMA, the *Accounting Sheet* was kept in the WMA office and completed when the receipts were collected the following week. However, the lockable seal number was not recorded on 11 of the 28 *Accounting Sheets* we selected for examination.
- At the Chassahowitzka and Three Lakes WMAs, the lockable seals were not maintained in a secure location.

Additionally, we examined Commission procedures and records related to the iron ranger collections at the Tenoroc FMA and found that Commission staff had established procedures that differed from those used at the WMAs. We noted the following procedural weaknesses in the Tenoroc FMA controls:

<sup>16</sup> Commission Rule 69A-9.007(4)(c)1., Florida Administrative Code.

- Lockable seals were not used and collections were made by one person.
- Access to the iron ranger collections was not appropriately restricted to applicable Tenoroc FMA staff. We are not disclosing the specific details of this issue in this report to avoid the possibility of compromising Commission resources. However, we have notified appropriate Commission management of the specific issue.

Absent appropriate and uniform controls for the collection and deposit of daily-use permit fees received at iron rangers, there is reduced assurance that the Commission will properly collect and safeguard the fees authorized by State laws and rules.

---

**Recommendation:** We recommend that Commission management strengthen controls over fees collected at iron rangers to promote the collection of appropriate fee amounts and to ensure that collections are appropriately safeguarded.

---

### Selected Administrative Activities

As part of our audit, we evaluated Commission controls related to information technology (IT) access, purchasing cards, and tangible personal property. As described in finding Nos. 5 through 8, our audit procedures disclosed that Commission controls needed enhancement.

---

#### Finding No. 5: Network and Revenue Systems Access Controls

---

Effective IT access controls include provisions to timely remove employee access privileges when employment terminations occur or access is no longer required. For employment terminations, we consider the removal of access privileges to be timely when the access is removed within 1 business day of an employee's date of separation.

Commission policies and procedures<sup>17</sup> required that a user's system access privileges be immediately removed when the user separated from employment or when the user transferred to another position where access was no longer required. Commission policies and procedures<sup>18</sup> also provided guidance related to network access management, specifying that an employee's supervisor was responsible for completing a *Departed Employee Form (Form)* as soon as the employee left the Commission. Upon receipt of the *Form* through the Commission's electronic workflow system, Office of Information Technology (OIT) staff were to disable the former employee's network access. Network access was needed to access the Commission's various revenue systems, except for the Recreational License Issuance Services (RLIS) System.

As part of our audit, we examined Commission records for 22 employees who separated from Commission employment during the period July 2012 through February 2014 and had previously been granted access to the Commission's network and one or more of the following revenue systems:

- The Revenue Internal Control System (RICS), used to track revenue documents, including transmittal logs for receipts and documentation of deposits.
- The Commercial Saltwater Licensing System (CSLS) and the Commercial Captive Wildlife System (CCWS), used to issue commercial licenses and permits.
- The Recreational License Issuance Services (RLIS) system, used to issue recreational licenses and permits.
- Permit Me, used to issue free permits, including crossbow and disability permits.

---

<sup>17</sup> Commission Policy and Procedure Section 3.3, *Password Policy*.

<sup>18</sup> Commission Office of Information Technology Policy and Procedure Section OIT – 2.1, *Disposition of Network User Accounts*.

Our audit procedures disclosed that the Commission did not always ensure that user access privileges were timely deactivated upon an employee's separation from Commission employment. Specifically, our audit tests found that:

- For 6 of the 13 former employees with network access privileges, the number of business days that elapsed from the date of employment separation to the deactivation date of the employee's network access privileges ranged from 8 to 275 days and averaged 115 days. For these 6 employees, the *Form* had not been timely completed by the former employee's supervisor.
- For the 16 former employees with RICS update capabilities, the number of days that elapsed from the date of employment separation to the deactivation date of the employees' RICS access privileges ranged from 49 to 386 business days and averaged 175 business days. RICS access privileges were deactivated subsequent to our audit inquiry for 13 of these 16 former employees. Four of these former employees are also included in the previous bullet regarding the untimely deactivation of network access privileges. The Commission could not provide evidence that the 16 former employees had not accessed the RICS subsequent to their dates of employment separation as the date a user last accessed the RCIS is not captured by the system.
- Commission staff did not timely deactivate, for two former RICS Security System Administrators, access privileges to the RICS Security System Administrator accounts or to the applicable RICS user accounts. One of the two administrators was the third-party vendor that developed the RICS; however, the Commission's contract with the vendor ended on June 30, 2010. Subsequent to our audit inquiry, these accounts were deactivated.
- Commission staff could not provide the deactivation date of user access privileges for the CSLS, the CCWS, and Permit Me. As a result, Commission records did not support the timely deactivation of access privileges for 7 former employees.
- Commission staff did not deactivate user access privileges for 1 of 2 former employees with RLIS system update capabilities until 83 days after the employee's termination date. Our review of Commission records indicated that the employee had not accessed the RLIS system after termination.

Absent timely deactivation of user access privileges, the Commission is exposed to a greater risk of unauthorized disclosure, modification, or destruction of Commission data and IT resources. Similar issues were noted in our report No. 2011-188, finding No. 8.

---

---

**Recommendation:** We recommend that Commission management strengthen IT controls to better ensure that user access privileges to the Commission network and revenue systems are timely deactivated upon employment or contractual termination. We also recommend that Commission management enhance CSLS, CCWS, and Permit Me controls to ensure records are maintained to demonstrate timely deactivation of access privileges upon a user's separation from Commission employment, or when access is no longer required.

---

---

---

---

#### **Finding No. 6: FLAIR Access Controls**

---

---

The Commission utilizes the Florida Accounting Information Resource Subsystem (FLAIR) to authorize payment of Commission obligations and to record and report financial transactions. Controls over employee access to FLAIR are necessary to help prevent and detect any improper or unauthorized use of FLAIR. Accordingly, FLAIR access should be promptly revoked when employees separate from the Commission or are reassigned to positions no longer requiring FLAIR access. In our report No. 2011-188, finding No. 11, we noted that the Commission had not established written procedures for the management of FLAIR access privileges and did not always timely revoke FLAIR access when employees separated from Commission employment.

In response to our audit inquiry in January 2014, Commission management indicated that, although they had not developed written procedures regarding FLAIR access, they were in the process of developing tools and enhancing

processes to strengthen FLAIR access controls. We noted that Commission forms and reports were available to facilitate the timely deactivation of FLAIR user access privileges. For example, the Commission's employee separation checklist specified that supervisors of employees with access to FLAIR were responsible for notifying the Finance and Budget Office to deactivate FLAIR user access privileges when an employee separated from Commission employment. Additionally, Human Resources periodically provided the Finance and Budget Office with a report of personnel actions, which was to be used to ensure FLAIR user access privileges were timely deactivated. However, we examined FLAIR user access records for 37 employees with FLAIR update capabilities who had separated from Commission employment during the period July 2012 through February 2014 and found that the FLAIR user access privileges for 23 employees remained active from 2 to 270 business days (an average of 37 business days) after the employees' termination dates.

In response to our audit inquiry, Commission management indicated that they had noted that the Human Resources report process did not result in the quick deletion of FLAIR user access privileges due to delays in receiving the reports. Therefore, in January 2014 the Finance and Budget Office requested to be placed on the departed employee e-mail notice provided by the OIT. Additionally, on July 3, 2014, the Finance and Budget Office issued a memorandum providing guidance on requesting and terminating FLAIR user access privileges. The memorandum specified that the employee's supervisor was responsible for completing a *FLAIR Access Control Form* and notifying the Commission's FLAIR Access Control Custodian within 2 business days of an employee's termination, and establishing a goal to remove FLAIR access within 3 business days of the termination.

While our review of FLAIR records did not disclose any transactions made by the 23 former employees subsequent to their separation from Commission employment, absent effective procedures that promote the prompt deactivation of user access privileges upon employment termination, the Commission is exposed to a greater risk of unauthorized disclosure, modification, or destruction of Commission data and IT resources.

---

---

**Recommendation:** We recommend that Commission management continue efforts to strengthen controls and ensure that FLAIR user access privileges are timely deactivated upon employment termination.

---

---

---

---

#### **Finding No. 7: Purchasing Card Cancellations**

---

As a participant in the State's purchasing card program (PCard Program), the Commission is responsible for the implementation of key controls, including the timely cancellation of PCards upon a cardholder's separation from Commission employment. The Commission established PCard guidelines<sup>19</sup> which specified that a cardholder's supervisor was to notify the Commission's PCard Program Administrator when a cardholder separated from employment and that the PCard Program Administrator was responsible for canceling the PCard. Additionally, on January 2, 2014, the PCard Administrator and Back-up Administrator began receiving OIT e-mail notices when personnel separated from employment.

As part of our audit, we examined Commission records and identified 83 cardholders who had separated from Commission employment during the period July 2012 through February 2014. Our audit tests found that for 45 of the 83 cardholders, or 54 percent, the number of business days that elapsed from the dates of employment termination to the dates of PCard cancellation ranged from 2 to 18 business days and averaged 8 business days.

In response to our audit inquiry, Commission management indicated that notifications of employment terminations were not always timely provided to the PCard Administrator, and that the new process of receiving OIT e-mail

---

<sup>19</sup> Commission Policy and Procedure Section 4.4, *Use of State Purchasing Card*.

notices should assist in lowering the number of days between a cardholder's employment termination date and the PCard cancellation date. However, the records we examined for the 83 cardholders included 13 cardholders who separated from Commission employment in January and February 2014, subsequent to the implementation of the new process. Our audit tests also disclosed that for 4 of these 13 cardholders, the number of business days that elapsed from the dates of employment termination to the dates of PCard cancellation ranged from 2 to 12 business days and averaged 5 business days.

Although our audit tests did not disclose any charges made subsequent to a cardholder's separation from Commission employment for the 45 PCards that were not timely canceled, absent timely cancellation of PCards the risk of unauthorized purchases is increased.

---

**Recommendation:** We recommend that Commission management continue efforts to ensure that PCards are timely canceled when cardholders separate from Commission employment.

---

---

**Finding No. 8: Tangible Personal Property Controls**

---

To promote the proper accountability for and safeguarding of tangible personal property,<sup>20</sup> Department of Financial Services (DFS) rules<sup>21</sup> require State agencies to complete an annual physical inventory of all tangible personal property at least once each fiscal year. As part of the annual physical inventory, State agencies are required to compare the results of the physical inventory to the detailed property records, identify and investigate discrepancies, and make adjustments to the detailed property records, as necessary.

To implement the DFS rules, the Commission established procedures<sup>22</sup> that required, among other activities, the performance of annual physical inspections of Commission property. The procedures also specified that items not located by the inventory reconciliation deadline were to be reported as missing to the Asset Management Office within 14 days of the reconciliation deadline. A *Notification of Missing Property* form (PC-201 form) was to be electronically prepared for each missing property item and, through an automated workflow system, routed to all applicable parties, including the Custodian Manager, Asset Management Office, and the Inspector General's Office. The PC-201 form was also to document the applicable dates, approvals, and actions completed by each party.

At the completion of the Commission's 2012-13 fiscal year annual physical inventory, 85 items with acquisition costs totaling \$317,250 had been noted as missing or stolen. As part of our audit, we reviewed Commission documentation for 25 items (20 items noted as missing and 5 items noted as stolen) with acquisition costs totaling \$134,884. Our audit procedures disclosed that Commission staff did not always follow established procedures for reporting missing property items. Specifically:

- PC-201 forms for 6 missing items were not submitted to the Asset Management Office within 14 days of the inventory reconciliation deadline. These items included a computer server, a generator, a mobile and a portable radio, scuba equipment, and night vision goggles. The number of days that elapsed from the inventory reconciliation deadline to the dates the forms were submitted to the Asset Management Office ranged from 19 to 80 days and averaged 48 days.

---

<sup>20</sup> Property is defined in applicable laws and rules as State-owned equipment, fixtures, and other tangible personal property of a nonconsumable or nonexpendable nature, the value or cost of which is \$1,000 or more and the projected useful life of which is one year or more.

<sup>21</sup> DFS Rule 69I-72.006, Florida Administrative Code.

<sup>22</sup> Commission Policy and Procedure Section 5.8, *Property*.

- PC-201 forms for 7 missing items (including 2 of the 6 items above) were not routed to the Inspector General's Office for review. According to Commission staff, the PC-201 forms for these 7 items were not properly routed due to a glitch in the automated workflow system.

Similar instances were noted in our report No. 2011-188, finding No. 12. Absent timely and documented execution of Commission procedures, there is reduced assurance that the Commission will timely detect, investigate, and take appropriate actions for asset losses and record errors.

---

**Recommendation:** We recommend that Commission management continue efforts to ensure that PC-201 forms are timely submitted and routed to all applicable personnel for appropriate action.

---

---

### PRIOR AUDIT FOLLOW-UP

---

Except as discussed in the preceding paragraphs, the Commission had taken corrective actions for the findings included in our report No. 2011-188.

---

### OBJECTIVES, SCOPE, AND METHODOLOGY

---

The Auditor General conducts operational audits of governmental entities to provide the Legislature, Florida's citizens, public entity management, and other stakeholders unbiased, timely, and relevant information for use in promoting government accountability and stewardship and improving government operations.

We conducted this operational audit from January 2014 through July 2014 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

This operational audit focused on the Commission's revenue collection processes and selected administrative activities. The overall objectives of the audit were:

- To evaluate management's performance in establishing and maintaining internal controls, including controls designed to prevent and detect fraud, waste, and abuse, and in administering assigned responsibilities in accordance with applicable laws, administrative rules, contracts, grant agreements, and guidelines.
- To examine internal controls designed and placed in operation to promote and encourage the achievement of management's control objectives in the categories of compliance, economic and efficient operations, the reliability of records and reports, and the safeguarding of assets, and identify weaknesses in those internal controls.
- To determine whether management had corrected, or was in the process of correcting, all deficiencies disclosed in our report No. 2011-188.
- To identify statutory and fiscal changes that may be recommended to the Legislature pursuant to Section 11.45(7)(h), Florida Statutes.

This audit was designed to identify, for those programs, activities, or functions included within the scope of the audit, deficiencies in management's internal controls, instances of noncompliance with applicable governing laws, rules, or contracts, and instances of inefficient or ineffective operational policies, procedures, or practices. The focus of this audit was to identify problems so that they may be corrected in such a way as to improve government accountability and efficiency and the stewardship of management. Professional judgment has been used in determining significance and audit risk and in selecting the particular transactions, legal compliance matters, records, and controls considered.

As described in more detail below, for those programs, activities, and functions included within the scope of our audit, our audit work included, but was not limited to, communicating to management and those charged with governance the scope, objectives, timing, overall methodology, and reporting of our audit; obtaining an understanding of the program, activity, or function; exercising professional judgment in considering significance and audit risk in the design and execution of the research, interviews, tests, analyses, and other procedures included in the audit methodology; obtaining reasonable assurance of the overall sufficiency and appropriateness of the evidence gathered in support of our audit's findings and conclusions; and reporting on the results of the audit as required by governing laws and auditing standards.

Our audit included the selection and examination of transactions and records. Unless otherwise indicated in this report, these transactions and records were not selected with the intent of statistically projecting the results, although we have presented for perspective, where practicable, information concerning relevant population value or size and quantifications relative to the items selected for examination.

An audit by its nature, does not include a review of all records and actions of agency management, staff, and vendors, and as a consequence, cannot be relied upon to identify all instances of noncompliance, fraud, abuse, or inefficiency.

In conducting our audit we:

- Reviewed Commission records to determine whether Commission staff calculated the amounts to be transferred or apportioned to the State Game and Marine Resources Conservation Trust Funds for the 2011-12 and 2012-13 fiscal years in accordance with State law and Commission procedures.
- Analyzed Commission data from the RLIS system, the CSLS, the CCWS, and FLAIR to evaluate the reasonableness of the revenues recorded during the period July 2012 through February 2014 considering the number of licenses and permits issued.
- Evaluated the effectiveness of Commission controls related to, and the reasonableness of amounts collected for, revenues collected by:
  - Interviewing Commission personnel to gain an understanding of the controls in place for field office collections.
  - Comparing revenues recorded in FLAIR to the Commission's list of revenue contracts to evaluate completeness.
  - Examining field office deposit records, including deposit slip numbers, iron ranger lockable seal numbers, and fish tag lot numbers, for each of the 10 field office locations where moneys were received to determine completeness and evaluate accountability.
  - Reviewing selected forms and reports documenting field office collections, such as *Iron Ranger Daily-Use Permit Accounting Sheets*, *Tenoroc FMA Shift Check-out Sheets*, and *Okeechobee Fish Tag Sales Reports* to determine whether the forms and reports were properly completed in accordance with Commission procedures.
- Obtained an understanding of Commission IT controls related to the RICS, the CSLS, the CCWS, Permit Me, and RLIS system, assessed the risks of those controls, evaluated whether selected general and application IT controls were in place, and tested the effectiveness of the controls.
- Evaluated the timeliness of the deactivation of Commission network, RICS, CSLS, CCWS, Permit Me, and RLIS system user access privileges, as applicable, for 22 Commission employees who separated from Commission employment during the period July 2012 through February 2014.
- Examined Commission records for 60 RLIS system license and permit sale transactions, 60 commercial license transactions, and 60 fees for sales of goods and services transactions to evaluate whether revenue collections were timely collected and deposited; collected in accordance with applicable laws, rules, and

contract terms; properly recorded and allocated; and whether controls were appropriately designed and operating effectively.

- Examined Commission records for 35 transactions, including refunds, voided transactions, and other transactions, made to adjust revenue accounts to determine whether the transactions were properly supported and recorded.
- Evaluated the Commission's process for obtaining background screenings for employees occupying positions of special trust, responsibility, or sensitive location, including IT positions and positions that had access to cash and checks received by the Commission, by examining Commission and People First records for 9 IT positions and 54 positions that had access to cash and checks received by the Commission, including 18 positions in the central office and 36 positions in field offices, to determine whether the positions were appropriately flagged in People First as requiring a background screening and whether appropriate background screenings had been obtained.
- Performed inquiries of Commission personnel and reviewed Commission policies and procedures to gain an understanding of the Commission's revenue accounts reconciliation processes. Examined the Quarterly State Accounts Reconciliations for revenue accounts for the quarters ended June 30, 2013, and December 31, 2013, to evaluate the effectiveness of Commission reconciliation procedures.
- Evaluated the Commission's efforts to monitor the third-party RLIS system vendor and the registered agents using the RLIS system to evaluate the effectiveness of Commission monitoring procedures.
- Reviewed the Commission's process for tracking the use of revenue generated under the Stone Crab, Blue Crab, and Spiny Lobster Programs to determine whether detailed accounts were maintained to demonstrate that the Commission used the revenue generated by these Programs in accordance with State law.
- Examined the information maintained on the Commission's License and Permit Information System Web site to determine whether the licensing information, including the legal authorities, prices, and exemptions, presented on the Web site was accurate.
- Performed analytical procedures for specialty license plate revenues and expenditures, and reviewed the methodology utilized to allocate expenditures to specialty license plate trust funds to determine Commission compliance with the requirements of State law.
- Examined documentation for 25 specialty license plate expenditures, totaling \$342,297, made by the Commission during the period July 2012 through February 2014 to determine whether the:
  - Expenditure was not prohibited by governing laws, rules, or Commission policy and, as applicable, was made in accordance with contract terms.
  - Goods and services received served an authorized purpose of the specialty license plate annual use fee.
  - Expenditure transaction was supported by appropriate documentation; correctly coded, recorded in the correct amount, and properly allocated in FLAIR; and paid in accordance with laws and regulations applicable to the source of funds.
  - Applicable contracts were procured in accordance with applicable laws and rules.
  - Commission had established effective procedures for the assigned contract manager to receive, review, and analyze contractually required reports and records.
- Performed inquiries of Commission personnel and reviewed Commission policies and procedures to gain an understanding of the Commission's monitoring processes for specialty license plates. Observed and evaluated selected processes to evaluate whether the Commission's monitoring controls for specialty license plates were in place and adequate to:
  - Properly receive and record the specialty license plate proceeds from the Department of Highway Safety and Motor Vehicles.
  - Properly allocate, record, and accumulate expenditures related to the specialty license plate proceeds.

- Ensure that the specialty license plate proceeds were used only for the authorized purposes specified in State law.
- Periodically monitor the revenues and expenditures related to the specialty license plates for compliance with applicable laws, rules, and other guidelines.
- Performed inquiries of Commission personnel and reviewed Department policies and procedures to gain an understanding of the Commission's FLAIR user access control process. Evaluated the timeliness of the deactivation of FLAIR user access privileges for 37 Commission employees who separated from Commission employment during the period July 2012 through February 2014.
- Performed inquiries of Commission personnel and reviewed Commission policies and procedures to gain an understanding of the Commission's State Purchasing Card Program. Examined Commission records for 83 purchasing cardholders who separated from Commission employment during the period July 2012 through February 2014 to determine whether the Commission timely canceled the employees' purchasing cards.
- Observed and evaluated the effectiveness of selected processes and procedures established to ensure the management of Commission tangible personal property in compliance with applicable laws and rules.
- Evaluated Commission policies, procedures, and processes for collecting and utilizing individuals' social security numbers to determine the extent of Commission compliance with the applicable requirements of State law.
- Examined Commission documentation of the physical tangible personal property inventory conducted for the 2012-13 fiscal year to determine whether Commission property was properly inventoried and if the inventory results were timely reconciled to the property records.
- Examined Commission documentation for 25 of the 85 tangible personal property items reported as missing or stolen during the 2012-13 fiscal year physical inventory to determine whether Commission personnel complied with DFS rules and Commission procedures regarding the reporting, investigating, and resolution of missing and stolen property items. The acquisition costs for the 25 items selected for examination totaled \$134,884.
- Reviewed applicable laws, rules and other State guidelines to obtain an understanding of the legal framework governing Commission operations.
- Observed, documented, and evaluated the effectiveness of selected Commission processes and procedures for:
  - Purchasing goods and services.
  - The assignment and use of motor vehicles. Commission motor vehicle acquisition costs totaled \$8,357,220 during the period July 2012 through February 2014.
  - The administration of Commission travel. Commission travel costs totaled \$3,971,094 during the period July 2012 through February 2014.
  - The acquisition, assignment, and use of wireless communication devices with related costs totaling \$754,080 for the period July 2012 through June 2014.
  - The management of Florida Single Audit Act activities in accordance with State law. Florida Single Audit Act expenditures totaled \$6,367,903 during the period July 2012 through February 2014.
- Communicated on an interim basis with applicable officials to ensure the timely resolution of issues involving controls and noncompliance.
- Performed various other auditing procedures, including analytical procedures, as necessary, to accomplish the objectives of the audit.
- Prepared and submitted for management response the findings and recommendations that are included in this report and which describe the matters requiring corrective actions.

**AUTHORITY**

Section 11.45, Florida Statutes, requires that the Auditor General conduct an operational audit of each State agency on a periodic basis. Pursuant to the provisions of Section 11.45, Florida Statutes, I have directed that this report be prepared to present the results of our operational audit.



David W. Martin, CPA  
Auditor General

**MANAGEMENT'S RESPONSE**

In a response letter dated December 24, 2014, the Executive Director of the Commission provided responses to our audit findings and recommendations. The Executive Director's response is included as **EXHIBIT A**.

EXHIBIT A  
MANAGEMENT'S RESPONSE



Florida Fish  
and Wildlife  
Conservation  
Commission

December 24, 2014

Commissioners  
**Richard A. Corbett**  
Chairman  
Tampa

**Brian Yablonski**  
Vice Chairman  
Tallahassee

**Ronald M. Bergeron**  
Fort Lauderdale

**Richard Hanas**  
Oviedo

**Aliese P. "Liesa" Priddy**  
Immokalee

**Bo Rivard**  
Panama City

**Charles W. Roberts III**  
Tallahassee

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

Dear Mr. Martin,

Please find enclosed our response to the preliminary and tentative audit findings and recommendations from your recent operational audit of the Florida Fish and Wildlife Conservation Commission, Revenue Collection Processes and Selected Administrative Activities.

We appreciate the professional manner in which your staff conducted this audit. We will utilize the audit results to improve our operations. If further information is required, please contact Mike Troelstrup, Inspector General, at (850) 488-6068.

Executive Staff  
**Nick Wiley**  
Executive Director

**Eric Sutton**  
Assistant Executive Director

**Jennifer Fitzwater**  
Chief of Staff

Sincerely,

Nick Wiley,  
Executive Director

Office of Inspector  
General  
**Mike Troelstrup**  
Inspector General

(850) 488-6068  
(850) 488-6414 FAX

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

620 South Meridian Street  
Tallahassee, Florida  
32399-1600  
Voice: (850) 488-4676

Hearing/speech-impaired:  
(800) 955-8771 (T)  
(800) 955-8770 (V)

MyFWC.com

**EXHIBIT A (CONTINUED)  
MANAGEMENT’S RESPONSE**

<b>FWC Response – 2014 AG Operational Audit: Revenue Collection Processes and Selected Administrative Activities</b>	
<b>Finding Number</b>	<b>1</b>
<b>Finding</b>	<b>The Commission had not allocated to the State Game and Marine Resources Conservation Trust Funds the 2011-2012 and 2012-2013 fiscal years’ interest earnings associated with the proceeds from the sale of 5-year licenses and permits.</b>
<b>Recommendations</b>	(R1) We recommend that Commission management ensure that interest earnings on 5-year license and permit sale proceeds are allocated timely, accurately, and in accordance with State law.
<b>FWC Response and Corrective Action Plan</b>	FWC concurs with this finding. The responsibility for monitoring and transferring one fifth of the total proceeds and interest earned from the sale of 5-year hunting and freshwater fishing licenses and from the sale of 5-year saltwater fishing licenses, was moved from the Office of Licensing and Permitting (OLP) to the purview of the Chief Financial Officer, in early June 2014. This change in responsibility aligns the required revenue transfers with the office that is responsible for monitoring the health of FWC trust funds. Staff members have been trained to use the correct FLAIR reports to ensure that final year end amounts are used when calculating interest earned. There has been no change to the methodology upon which the quarterly transfer amounts are calculated.
<b>Finding Number 2</b>	
<b>Finding</b>	<b>The Commission had not established policies and procedures for the collection and use of social security numbers. In addition, the Commission did not always provide a written notification regarding the purpose for collecting the number to each individual whose social security number was collected.</b>
<b>Recommendations</b>	(R2) We recommend that Commission management establish written policies and procedures regarding the collection and use of individual’s SSNs and continue efforts to ensure that individuals are provided written notification, as required by State law, of the Commission’s purpose for collecting SSNs.
<b>FWC Response and Corrective Action Plan</b>	FWC concurs with this finding. The OLP has established and distributed to staff a policy, see below, regarding the collection and use of social security numbers that clarifies the purposes for which SSN may be used, and requires any form produced or maintained by OLP must include the written notification regarding the purpose of collecting social security numbers. Additionally, all OLP forms have been reviewed for compliance with this policy

**EXHIBIT A (CONTINUED)  
MANAGEMENT’S RESPONSE**

	<p>and non-compliant forms have been corrected to include the written notification regarding the purpose of collecting social security numbers.</p> <p style="text-align: center;"><b>OLP Policy on Collection and Use of Social Security Numbers</b></p> <p>The Florida Fish and Wildlife Conservation Commission (FWC) collects social security number (SSN) for the issuance of recreational and professional fishing or hunting licenses or permits to an individual in accordance with s. 379.352 F.S. and 42 USC 666 for the purposes of administration of the Title IV-D program for child support enforcement, use by the commission, and as otherwise provided by law. SSN may only be used for the purposes specifically authorized by law. Any form produced or maintained by the Office of Licensing and Permitting (OLP) that collects SSN must include a written notification regarding the purpose of collecting SSN. In the event that OLP staff become aware of any FWC form that is not in compliance with this policy, staff must notify OLP management immediately and management will take the necessary steps to ensure the form is brought into compliance.</p> <p>The above policy was communicated to all FWC users on 12/12/14.</p>
--	---

<b>Finding Number</b>	<b>3</b>
<b>Finding</b>	<b>The Commission did not always ensure that employees responsible for handling cash and checks received required background screenings.</b>
<b>Recommendations</b>	(R3) We recommend that Commission management ensure that required background screenings are completed for employees in designated positions of special trust, responsibility, or sensitive location.
<b>FWC Response and Corrective Action Plan</b>	FWC concurs with this finding. Fingerprint investigations have been completed for all employees involved in the collection process. In addition, position descriptions for all employees involved in iron ranger, Tenoroc, and Okeechobee Game Fish Tag fees collections have been updated to include a finger print investigation requirement.

**EXHIBIT A (CONTINUED)  
MANAGEMENT'S RESPONSE**

Finding Number	<b>4</b>
Finding	<b>Controls over daily use permit fees collected at iron rangers located in Commission management areas could be improved.</b>
Recommendations	(R4) We recommend that Commission management strengthen controls over fees collected at iron rangers to promote the collection of appropriate fee amounts and to ensure that collections are appropriately safeguarded.
FWC Response and Corrective Action Plan	<p>FWC concurs with this finding. In the best interest of the public, we will develop a regulation proposal to change the daily-use permit for all outdoor recreational activities, with the exception of hunting, from \$4 per person to \$3 per person. This proposed rule change is anticipated to go into effect July 1, 2016. Policies and procedures related to iron ranger collections were communicated to appropriate staff in May of 2014. Copies of the procedures are accessible to staff via an internal Sharepoint site.</p> <p>Additionally, in regards to the Tenoroc Fish Management Area, we have changed the lock on the collection box and reduced the number of keys to one, which will be in the possession of the area manager. We have also implemented a protocol of two people being present when money is collected from the iron ranger.</p>

Finding Number	<b>5</b>
Finding	<b>As similarly noted in our report No. 2011-188, information technology user access privileges to Commission network and revenue systems were not always timely deactivated upon an employee's separation from Commission employment.</b>
Recommendations	(R5) We recommend that Commission management strengthen IT controls to better ensure that user access privileges to the Commission network and revenue systems are timely deactivated upon employment or contractual termination. (R6) We also recommend that Commission management enhance CSLS, CCWS, and Permit Me controls to ensure records are maintained to demonstrate timely deactivation of access privileges upon a user's separation from Commission employment, or when access is no longer required.
FWC Response and Corrective Action Plan	Upon receipt of a Departed User form, The Office of Information Technology (OIT) runs a script which <i>disables</i> the user account, changes the password, and removes access groups from the user account (for example, network folders). The above mentioned

**EXHIBIT A (CONTINUED)  
MANAGEMENT'S RESPONSE**

	control prohibits departed users from accessing the FWC network. Certain situations (investigations, supervisors requesting access and/or copies of emails and files, etc.) require the accounts to remain open; however, the departed user can no longer access the account. The Departed User forms are not completed (resulting in account deletion) until the above mentioned situations are satisfied. The FWC recognizes the need for strengthened controls over the Departed User process. The OIT has since updated the Departed User form to include account disable and deletion dates. Additionally, the forms also include dates related to the removal of access from RLIS, CSLS, CCWS, Permit Me and FLAIR. All appropriate individuals are included in the work flow of the new Departed User form.
<b>Finding Number</b>	<b>6</b>
<b>Finding</b>	<b>As similarly noted in our report No. 2011-188, Florida Accounting Information Resource Subsystem user access privileges were not always timely deactivated upon an employee's separation from Commission employment.</b>
<b>Recommendations</b>	(R7) We recommend that Commission management continue efforts to strengthen controls to ensure that FLAIR user access privileges are timely deactivated upon employment termination.
<b>FWC Response and Corrective Action Plan</b>	FWC concurs with this finding. FLAIR access control procedures were established and communicated to all users, effective July 3, 2014. These procedures will continue to be followed and FLAIR access privileges will be routinely reviewed.

**EXHIBIT A (CONTINUED)  
MANAGEMENT'S RESPONSE**

<b>Finding Number</b>	<b>7</b>
<b>Finding</b>	<b>Commission staff did not always timely cancel purchasing cards upon a cardholder's separation from Commission employment.</b>
<b>Recommendations</b>	(R8) We recommend that Commission management continue efforts to ensure that PCards are timely canceled when cardholders separate from Commission employment.
<b>FWC Response and Corrective Action Plan</b>	FWC concurs with this finding. The Finance and Budget Office (FBO) established an email distribution group for FBO notifications. FBO staff members now receive auto-generated emails, notifying them of departed users. Staff members have also been instructed to set up deactivation alerts via Sharepoint. These alerts automatically generate emails, notifying the appropriate individuals of departed users.

<b>Finding Number</b>	<b>8</b>
<b>Finding</b>	<b>As similarly noted in our report No. 2011-188, Commission staff did not always follow Commission procedures for reporting missing tangible personal property items.</b>
<b>Recommendations</b>	(R9) We recommend that Commission management continue efforts to ensure that PC-201 forms are timely submitted and routed to all applicable personnel for appropriate action.
<b>FWC Response and Corrective Action Plan</b>	FWC concurs with this finding. The FBO developed custodian instructions, which were placed on SharePoint for reference and access. These instructions direct custodians to timely submit the PC 201 form (Missing property) as per Agency Internal Management Policy and Procedure 5.8. Additionally, the FBO is also taking active steps to monitor the electronic workflow for the PC 201 form in InfoPath to ensure the workflow routes to the appropriate personnel. The Commission is currently in the process of moving all InfoPath based forms to a more stable web-based platform.