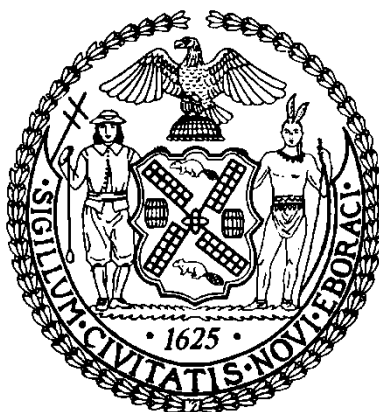


**CITY OF NEW YORK
OFFICE OF THE COMPTROLLER**

**John C. Liu
Comptroller**

BUREAU OF FINANCIAL AUDIT

**H. Tina Kim
Deputy Comptroller for Audit**

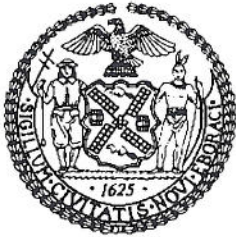


**Follow-up Audit Report on the
Development and Implementation
of the Legal Tracking System by the
Administration for Children's Services**

7F10-138

March 18, 2011

<http://comptroller.nyc.gov>



THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
1 CENTRE STREET
NEW YORK, N.Y. 10007-2341

John C. Liu
COMPTROLLER

March 18, 2011

To the Residents of the City of New York:

My office has audited the Administration for Children's Services (ACS) to determine whether the agency implemented the nine recommendations made the previous audit entitled *Audit Report on the Development and Implementation of the Legal Tracking System by the Administration for Children's Services* (Audit No. 7A05-085, issued May 23, 2006).

The current follow-up audit disclosed that of the nine recommendations made in the previous audit, ACS implemented eight recommendations and did not implement one. ACS has completed primary functionalities of Legal Tracking System (LTS) Phase III and has assigned an official from the Management Information System to the Division of Family Court Legal Services to serve as the project manager for LTS. We found that LTS users are generally satisfied with the system's availability, training, layout, accuracy, and ease of use. However, we could not find 24 LTS users in the City's Payroll Management System (PMS) and an additional 58 users appear in PMS as inactive employees. ACS generally agreed with the current report's recommendation to periodically review and track system users and terminate inactive User IDs.

The results of the audit have been discussed with ACS officials, and their comments have been considered in preparing this report. Their complete written response is attached to this report.

If you have any questions concerning this report, please e-mail my audit bureau at audit@comptroller.nyc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "John C. Liu".

John C. Liu

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*The City of New York
Office of the Comptroller
Bureau of Financial Audit
IT Audit*

**Follow-up Audit Report on the
Development and Implementation
of the Legal Tracking System by the
Administration for Children's Services**

7F10-138

AUDIT REPORT IN BRIEF

This follow-up audit determined whether the Administration for Children's Services (ACS) has implemented the nine recommendations made in a previous audit entitled *Audit Report on the Development and Implementation of the Legal Tracking System by the Administration for Children's Services* (Audit No. 7A05-085, issued May 23, 2006).

The prior audit evaluated whether the development of the Legal Tracking System (LTS) followed a formal system development methodology, met the initial business and operational requirements, was designed to allow for future enhancements and upgrades, was secure from unauthorized access, and contained accurate information in the database. The previous audit also examined whether LTS was procured in accordance with City Charter provisions and Procurement Policy Board Rules, and whether it has been incorporated into the ACS disaster recovery plan.

The prior audit found that LTS generally functions reliably and contains accurate current information; however, access controls need improvement, and data converted from a prior system were often found to be inaccurate and incomplete. ACS had also not incorporated LTS into its disaster recovery plan. Finally, the survey of LTS users conducted during the last audit disclosed that 33 percent of the users who responded to the survey were happy with LTS, while 67 percent were somewhat satisfied with LTS but would like to see changes made to the system, to enhance user screens, and to improve the accuracy of the data.

Audit Findings and Conclusions

The current follow-up audit disclosed that ACS has implemented eight recommendations and did not implement one of the nine recommendations made in the previous audit. ACS has completed primary functionalities of LTS Phase III (i.e., adequately defined the business and

system requirements) and has assigned a Client Relation Manager from the Management Information System (MIS) to the Division of Family Court Legal Services (FCLS) to serve as the project manager for LTS. It provided documentation to confirm that it plans to hire an outside Quality Assurance (QA) consultant for a future system project. ACS provided a copy of its disaster recovery plan, which includes LTS. It also provided documentation showing that ACS MIS conducted tests in December 2010 on its recovery plan. Based on our survey, we found that LTS users are generally satisfied with the system's availability, training, layout, accuracy, and ease of use. Finally, ACS has provided a written procedure for terminating its users. However, our review of LTS user accounts found that 24 user names could not be found in the City's Payroll Management System (PMS) while an additional 58 user names appear in PMS as inactive. This is of concern because LTS contains personal and private information regarding ACS clients.

Audit Recommendation

To address the outstanding issue from the previous audit that still exists, we recommend that ACS officials should periodically review and track system users and terminate inactive User IDs.

Agency Response

ACS generally agreed with the findings and the recommendation of this audit. The full text of the ACS response is included as an addendum to this report.

INTRODUCTION

Background

ACS provides protection to children subjected to abuse and neglect; preventive services to families to maintain the safety of children; and, when necessary, provides safe foster care or adoptive homes to children. ACS also administers child care and early childhood education.

ACS' FCLS is responsible for representing children's services in child neglect and abuse cases, permanency hearing, and other child welfare proceeding in the New York City Family Courts. There are five Family Court Units in each borough. Prior to 2000, FCLS used Child Abuse Case Tracking System (CACTS) to prepare and generate petitions. However, CACTS could not track outcomes of hearings or collect data. To better track court outcomes on the cases and provide information to the social workers to use in their work with the family. ACS decided to create LTS—a comprehensive, integrated system for FCLS with one shared database that all the attorneys could access as well as the casework staff at the agency.

Objective

The objective of this follow-up audit was to determine whether ACS implemented nine recommendations contained in a previous audit, *Audit Report on the Development and Implementation of the Legal Tracking System by the Administration for Children's Services* (Audit No. 7A05-085, issued May 23, 2006).

Scope and Methodology

We conducted this performance audit 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 audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The scope period of this follow-up audit was Fiscal Year 2010. To meet our objectives, we interviewed ACS FCLS officials and reviewed LTS written policies and procedures. In addition, we:

- Reviewed the prior audit report issued by the Comptroller's Office, *Audit Report on the Development and Implementation of the Legal Tracking System by the Administration for Children's Services*, Audit No.7A05-085, issued May 23, 2006;
- Conducted a system walk-through to review how LTS functions;

- Reviewed ACS MIS's security policies and procedures;
- Reviewed ACS MIS's disaster recovery plan and IT Services Disaster Mitigation Manual;
- Reviewed and determined whether the main functionalities of LTS Phase III have been completed;
- Compared a list of LTS users (1,776) provided by ACS with the City's PMS to determine whether these users are active employees; and
- Conducted a user survey to determine whether users were satisfied with LTS and what changes they would recommend be made to the system. We sent out a survey to 78 of the 395 LTS users that ACS identified as primary users. The 78 users were randomly selected. We received 56 responses from the 78 users.

As criteria, we used the Department of Information Technology and Telecommunications (DoITT) Citywide Information Security Policies and Directives, and the National Institute of Standards and Technology (NIST) Standards.

Discussion of Audit Results

The matters covered in this report were discussed with ACS officials during and at the conclusion of this audit. A preliminary draft report was sent to ACS officials and was discussed at an exit conference held on January 24, 2011. On February 7, 2011, we submitted a draft report to ACS officials with a request for comments. We received a written response from ACS officials on February 22, 2011. ACS generally agreed with the findings and the recommendation of this audit. The full text of the ACS response is included as an addendum to this report.

RESULTS OF FOLLOW-UP AUDIT

The current follow-up audit disclosed that ACS has implemented eight recommendations and did not implement one of the nine recommendations made in the previous audit. ACS has completed primary functionalities of LTS Phase III (i.e., adequately defined the business and system requirements) and has appointed an MIS Client Relation Manager to serve as the project manager for LTS. It provided documentation to confirm that it plans to hire an outside QA consultant for a future system project. ACS provided a copy of its disaster recovery plan which includes LTS. It also provided documentation showing that ACS MIS conducted tests in December 2010 on its recovery plan. Based on our survey, we found that LTS users are generally satisfied with the system's availability, training, layout, accuracy, and ease of use. Finally, ACS has provided a written procedure for terminating its users. However, our review of LTS user accounts found 24 user names that could not be found in PMS while an additional 58 user names that appeared in PMS as inactive. This is of concern because LTS contains personal and private information regarding ACS clients.

Previous Finding: "System Requirements Not Completely Defined"

Previous Recommendation #1: ACS should "Ensure that business and system requirements are adequately defined for the remaining LTS development."

Previous Response #1: ACS stated that it will "conduct bi-weekly meetings with FCLS [Division of Family Court Legal Services] management and Borough Supervisors to define requirements for remaining LTS development. Document the meeting results, disseminate to participants for comments and archive in the LTS Requirements folder for permanent documentation and reference."

Current Status: IMPLEMENTED

ACS officials provided a detailed status of the Phase III requirements. During walk-throughs of the LTS system, we noted that the essential and critical areas of Phase III requirements have been implemented. In addition, there are areas of the LTS system that were revised to meet the requirements of the (December 21, 2005) change in the State regulations. Therefore, we consider this recommendation to be implemented.

Previous Finding: "Multiple Project Management Changes"

Previous Recommendation #2: ACS should "Continue to serve as project manager for the final phase of the development; however, ACS must implement our recommendation, which follows, to employ an independent quality assurance consultant."

Previous Response#2: ACS stated that it will "maintain the ACS project manager as the active operational project manager for LTS."

Current Status: IMPLEMENTED

ACS has appointed a MIS Client Relation Manger to serve as the project manager for LTS. This official served as the LTS project manger during the final development phase of LTS. In addition, as further disclosed under Previous Recommendation #4 below, ACS is in the process of hiring an outside (i.e., independent) QA consultant for an upcoming system development project. Therefore, we consider this recommendation to be implemented.

Previous Finding: “Data Conversion Problems”

Previous Recommendation #3: ACS should “Ensure that all information recorded in LTS is thorough and accurate.”

Previous Response #3: ACS stated that it will “set up quality assurance process for LTS.”

Current Status: IMPLEMENTED

Based on our survey results of LTS primary users (attorney, general counsel, and support staff), 52 (93%) out of the 56 respondents found that the data in LTS are somewhat accurate and users are generally satisfied with the LTS. Therefore, we consider this recommendation to be implemented.

Previous Finding: “Inadequate Quality Assurance”

Previous Recommendation #4: ACS should “Employ an independent quality-assurance consultant to oversee and monitor the entire development process from its inception.”

Previous Response #4: “ACS hired a consultant for a Quality Assurance/Strategic Plan Implementation Initiative which included LTS. ACS has tried to address this problem for future development through the hiring of a consultant, Visionary Integration Professionals, Inc. (VIP), who developed a strategic plan for ACS/MIS systems and applications.”

Current Status: IMPLEMENTED

ACS MIS provided a draft copy of a solicitation for an outside QA consultant for an upcoming system development project. The solicitation for the upcoming system stated the purpose of the request, and provided a project overview, project timeline and the project organization. It also included a description of services required of the contractor, the contractor’s proposal and basis of contractor selection. The solicitation included the QA services. Therefore, we consider this recommendation to be implemented.

Previous Finding: “User Accounts Not Adequately Controlled”

Previous Recommendation #5: ACS should “Develop written policies and procedures for tracking system users and terminating inactive User IDs. In addition, ACS should periodically review the status of inactive user accounts and terminate access, when appropriate.”

Previous Response#5: ACS stated that it will “coordinate LTS within ACS’ written policies and procedures for tracking system users and terminating inactive IDs.”

Current Status: NOT IMPLEMENTED

ACS has provided a written procedure for disabling user accounts when the user leaves the agency. However, our match of the City’s PMS with LTS user names found 66 users listed as current users on LTS, who are, in fact, inactive (i.e. terminated or on leave) on PMS. In addition, we found 63 LTS user names not listed in PMS. On further review of these lists, we found an ACS employee’s user name different from the name on PMS. This led us to believe that there may be other ACS employees that use other names, such as nickname, as their user name.

After the exit conference, ACS provided information on both user lists. We verified the information, however, there are still 58 LTS users listed as inactive on PMS and 24 users not found on PMS. Therefore, until ACS’s records accurately reflect the current status of its employees as recorded on PMS we consider this recommendation not implemented.

Previous Recommendation #6: ACS should “Terminate inactive accounts identified in this audit.”

Previous Response #6: “ACS stated that it will “terminate inactive LTS accounts identified in Audit.”

Current Status: IMPLEMENTED

To determine whether the 328 inactive accounts identified in the previous report were terminated from the current user list, we performed a match and found that those previously identified users are not on the current accounts. Therefore, we consider this recommendation to be implemented.

Previous Finding: “Incomplete Disaster Recovery Plan”

Previous Recommendation #7: ACS should “Update the disaster recovery plan to include LTS, conduct a comprehensive test of the plan, and schedule annual tests, as required by Comptroller’s Directive #18.”

Previous Response#7: “LTS is to be included in the ACS MIS Disaster Recovery Plan.”

Current Status: IMPLEMENTED

ACS has provided a comprehensive agency-wide disaster recovery plan. We reviewed the plan and found that LTS is included in the plan. In addition, ACS MIS provided documentation to show recent (December 2010) disaster recovery plan test results. Therefore, we consider this recommendation to be implemented.

Previous Finding: User Satisfaction Survey; “Sixty-seven percent were somewhat satisfied with LTS, but would like to see changes made to the system, to enhance user screens, and to improve the accuracy of the data.”

Previous Recommendation #8: ACS should “Ensure that the user concerns identified in the report are addressed. In this regard, ACS should work towards shortening system-response times, increasing application availability, standardizing screens and modes of completing action, isolating errors, improving handling of reported problems by the help desk, and providing more frequent training.”

Previous Response#8: ACS stated that it will “address concerns cited above in LTS code enhancement: shortening system-response times, standardizing screens and modes of completing action. ACS has gradually been increasing application availability to other divisions outside of the legal department. Agencies now use a portion of LTS as well. We will continue to expand the use of LTS as needed. [We will] isolate errors as part of troubleshooting and problem resolution. [We] will work to integrate LTS into Help Desk.”

Current Status: IMPLEMENTED

Our survey revealed that LTS users are generally satisfied with the system. Fifty-two (93%) out of 56 respondents found that the system is often available. About 86 percent, 48 out of 56 respondents, felt that they received sufficient training, and the same percentage of users felt that the screen layouts are easy to somewhat easy to work with. Less than half of the respondents (25 respondents) answered the survey questions regarding the helpdesk’s timely resolution of problems. The 25 respondents who answered the questions found that their issues were resolved within 48 hours (19 within 24 hours and six within 48 hours) by the helpdesk. Therefore, we consider this recommendation to be implemented.

Previous Recommendation #9: ACS should “Conduct periodic surveys of users to ensure that their concerns are addressed.”

Previous Response #9: ACS stated that it will “conduct bi-weekly meetings with FCLS management and Borough Supervisors to define requirements for remaining LTS development. Document the meeting results, disseminate to participants for comments and archive in the LTS Requirements folder for permanent documentation and reference.”

Current Status: IMPLEMENTED

ACS MIS has conducted periodic meetings with the LTS users to address their issues with the system. We performed a user survey as part of the follow-up audit to determine whether LTS users are currently satisfied with the system. We randomly selected 78 users for our sample and received 56 returned responses. Based on the survey result, we found that 61 percent (34) of the respondents agree that the data are very easy or somewhat easy to enter. In addition,

- 54 of the 56 respondents feel that the system is often available,
- 52 respondents feel that the data is either always accurate (eight) or somewhat accurate (44),
- 52 respondents feel that LTS is either easy to use (23) or somewhat easy to use (29), and
- 48 respondents feel that they received sufficient training.

Therefore, we consider this recommendation to be implemented.

RECOMMENDATION

To address the outstanding issue from the previous audit that still exists, we recommend that ACS officials should periodically review and track system users and terminate inactive User IDs.

ACS Response: “Under our current security procedures, once a user’s account has been deactivated in the ACS Active Directory (AD) s/he will not be able to logon to our network at all and, thus, cannot access the ACS intranet web page. If s/he can not get to the ACS intranet, s/he will not be able to get into LTS. Additionally, when any active user of LTS has not accessed LTS for a period of 90 days his/her privileges to use LTS are terminated. This will occur even if the user is still in the ACS AD.

The ACS short term solution to the Audit recommendation will be to have FCLS Assistant Commissioner [] added to the distribution list to which Personnel e-mails the ‘Ceased Staff’ on a daily basis. The Ceased Staff list is already prepared and e-mailed to MIS by Personnel for overall system access removal. A member of Assistant Commissioner [] staff will be responsible for inactivating any active LTS users which appear on the Ceased Staff list. The long term solution to the Audit recommendation will be to use an automated Identity and Access Management software solution. This solution is planned to be in place within 2-3 years.”



Julie Bittman
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February 22, 2011

H. Tina Kim
Deputy Comptroller for Audit
NYC Office of the Comptroller
1 Centre Street – Room 1100N
New York, NY 10007

**RE: Draft Follow-up Audit Report on the Development and Implementation
of the Legal Tracking System by the Administration for Children's
Services [7F10-138]**

Dear Ms. Kim:

Attached please find the ACS Response to the Audit Recommendation and the Audit Implementation Plan for the above-referenced audit. Please call or e-mail me if you have any questions regarding the attached documents. I can be reached at 212-676-8861 or by e-mail at: julie.bittman@dfa.state.ny.us.

Thank you,



Julie Bittman
Director, External Audit

cc: John Mattingly

February 2011
ACS RESPONSE TO AUDIT RECOMMENDATION

New York City Comptroller Follow-up Audit on Development and
Implementation of the Legal Tracking System by the Administration for Children's Services
7F10-138

RECOMMENDATION – *To address the outstanding issue from the previous audit that still exists, we recommend that ACS officials should periodically review and track system users and terminate inactive User IDs.*

ACS RESPONSE

Under our current security procedures, once a user's account has been deactivated in the ACS Active Directory (AD) s/he will not be able to logon to our network at all and, thus, cannot access the ACS intranet web page. If s/he can not get to the ACS intranet, s/he will not be able to get into LTS. Additionally, when any active user of LTS has not accessed LTS for a period of 90 days his/her privileges to use LTS are terminated. This will occur even if the user is still in the ACS AD.

The ACS short term solution to the Audit recommendation will be to have FCLS Assistant Commissioner [REDACTED] added to the distribution list to which Personnel e-mails the "Ceased Staff" on a daily basis. The Ceased Staff list is already prepared and e-mailed to MIS by Personnel for overall system access removal. A member of Assistant Commissioner [REDACTED] staff will be responsible for inactivating any active LTS users which appear on the Ceased Staff list. The long term solution to the Audit recommendation will be to use an automated Identity and Access Management software solution. This solution is planned to be in place within 2-3 years.

February 2011

ADMINISTRATION FOR CHILDREN'S SERVICES AUDIT IMPLEMENTATION PLAN
New York City Comptroller Follow-up Audit on Development and
Implementation of the Legal Tracking System by the Administration for Children's Services
7F10-138

RECOMMENDATION – *To address the outstanding issue from the previous audit that still exists, we recommend that ACS officials should periodically review and track system users and terminate inactive User IDs.*

RESPONSIBLE MANAGER'S NAME: [REDACTED]

CORRECTIVE ACTIONS TO BE TAKEN	RESPONSIBLE PERSON	DATES		COMMENTS
		START	END	
1. The list of ceased staff will be e-mailed to FCLS Assistant Commissioner [REDACTED] by ACS' Personnel department on a daily basis.	[REDACTED]	03/01/11	On going	The "Ceased Staff" list is already prepared and e-mailed by Personnel to MIS on a daily basis for removal of overall system access.
2. FCLS will inactivate any LTS users on the Ceased Staff list.	[REDACTED]	03/01/11	On going	
3. MIS will run a list from LTS on a bi-annual basis to validate the user IDs.	[REDACTED]	03/01/11	On going	