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Agenda Item No. 7(A)
April 13, 2011

BOARD OF COUNTY COMMISSIONERS
OFFICE OF THE COMMISSION AUDITOR

MEMORANDUM

TO: The Honorable Joe A. Martinez, Chairman
and Members, Board of County Commissioners

FROM: Charles Anderson, CPA
Commission Auditor

DATE: January 21, 2011

SUBJECT: Review of Community Action Agency Operations

We have concluded our Review of Community Action Agency Operations and submit this report, which contains observations, recommendations, and management responses. Management did not concur with some of our recommendations. We have provided clarifying comments where they did not concur.

We thank the staff of the Community Action Agency for their cooperation and input throughout the review. Please let me know if you need further information.

c: Honorable Carlos Alvarez, Mayor
George Burgess, County Manager
R. A. Cuevas, Jr., County Attorney
Chris Mazzella, Inspector General
Howard Piper, Special Assistant for Management and Performance Assessment
Cathy Jackson, Director, Audit and Management Services
Julie Edwards, Director, Community Action Agency

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MIAMI-DADE COUNTY BOARD OF COUNTY COMMISSIONERS

OFFICE OF THE COMMISSION AUDITOR

REVIEW OF COMMUNITY ACTION AGENCY OPERATIONS

Project Number 08-187123

January 21, 2011

Charles Anderson, CPA
Commission Auditor

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I. Objective and Scope

As part of the work plan approved by the Miami-Dade County Board of County Commissioners (BCC), the Office of Commission Auditor (OCA) conducted a review of the Miami-Dade Community Action Agency (CAA) Operations. The objectives of the review were to:

(1) Assess the alignment of programs operations with legislative intent;
(2) Assess the compliance of programs fiscal management with fiscal policies; and
(3) Assess the control environment for agency operations.

The review covered the periods from October 1, 2007 through September 30, 2009 (FY 2007-08 and FY 2008-09).

II. 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 finding 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.

We used a risk-based approach to select programs and activities for review in the following divisions and units:

- Energy Division with specific focus on the Florida Weatherization Assistance Program (WAP) Low Income Home Energy Assistance Program (LIHEAP)
- Fiscal Management Division
- Greater Miami Service Corps
- Head Start/Early Start Division
- Self-help Division
- Information Technology (IT) Unit
- Quality Improvement Unit (QIU)

Our assessment of information systems was limited to a review of general controls[1] that affect the confidentiality, integrity, and availability of CAA information assets.[2] To keep within the scope of our review, we did not independently audit each specific system or application used by CAA.

To accomplish our objectives, we gathered relevant data through a review of related reports, state statutes, county ordinances, contract documents, documented policies and procedures, manuals, files, and databases, in addition to interviews with staff members. For Objective 3, we adapted the Federal Information System Controls Audit Manual (FISCAM) issued by the United States Government Accountability Office (GAO) to assess CAA information systems general controls.

[1] Information systems general controls are the set of policies, procedures and control activities that apply to all segments of an entity information systems and help ensure their proper operations (FISCAM).
[2] Information and the systems that use, store and transmit information

III. Background

CAA provides a variety of services to the Miami-Dade community through programs targeted at eliminating the effects and causes of poverty. CAA's programs are funded either directly through federal grants or through the State of Florida's (State) Community Service Block Grant (CSBG). Funds from state and local communities provide additional sources of funds to supplement money from the federal government. CAA is comprised of five divisions, namely: Fiscal Management, Head Start/Early Start, Energy, Self-Help, and Greater Miami Service Corps. The IT, Quality Improvement, and Human Resources units provide centralized support services to all the divisions.

Fiscal Management Division administers fiscal and budgetary operation, including grant monitoring, purchasing, account payable/receivable, and fiscal reporting.

Head Start/Early Start Division provides comprehensive child development programs for children (newborn to age five) from low-income families.

Energy Division provides services to low income, elderly, and disabled homeowners to increase energy efficiency with respect to heating and cooling. They also administer programs such as home rehabilitation, senior housing assistance repairs, and beautification.

Self-Help Division provides services to assist low-income individuals, families and communities toward self-sufficiency. The division operates 14 community enrichment centers that administer the Low Income Home Energy Assistance Program (LIHEAP), and provide services such as information referral, placement, computer training, and emergency assistance.

Greater Miami Service Corps provides youths (ages 18-23) with education and employment opportunities, while promoting volunteerism and community services.

IV. Summary Results

- Additional federal funds may be available to reimburse indirect costs of programs funded by federal awards. (Finding 1)
- Improvements are needed in WAP-LIHEAP project file documentation and program reporting. (Finding 2.1)
- Improvements are need in evaluations of clients' homes and in documentation of agreements with clients prior to commencement of WAP work. (Finding 2.2)
- CAA needs a formal information security management program and needs to urgently correct identified control weaknesses for better protection of its information assets. (Finding 3)
- Quality Improvement Reviews of CAA operations were not conducted as frequently as required by CAA operational procedures. (Finding 4)

V. Findings and Recommendations

A. Program Fiscal Management and Reporting

Finding 1. Additional federal funds may be available to reimburse indirect costs of programs funded by federal awards.

CAA did not prepare "indirect cost rate proposals" that are required by Attachment E to OMB Circular A-87 in order for state and local governmental units to seek reimbursement for indirect costs. The "indirect cost rate" calculates the proportion of indirect costs each program should bear. It is the ratio (expressed as a percentage) of the indirect costs to a direct cost base.

Instead, CAA allocated indirect cost to the divisions/programs based on the amount budgeted for each program/division. The methodology in use was not calculated based on the proportion of benefits provided to each program.

OMB Circular A-87 defines indirect costs as:

> *Those costs that have been incurred for common or joint purposes. They benefit more than one cost objective and cannot be readily identified with a particular final cost objective without effort disproportionate to the results achieved. After direct costs have been determined and assigned directly to federal awards and other activities as appropriate, indirect costs are those remaining to be allocated to benefitted cost objectives.*

OMB Circular A-87 requires all departments or agencies of the governmental unit desiring to claim indirect costs under federal awards to prepare an indirect cost rate proposal and related documentation to support those costs and to maintain the proposal and supporting documentation for audit. The circular further states that indirect cost pools should be distributed to benefitted cost objectives on a basis that will produce an equitable result in consideration of relative benefits derived.

Predetermined rates. For established programs that have previously negotiated indirect cost rates with the cognizant agency, OMB Circular A-87 encourages negotiation of predetermined rates that can be made applicable for a period of two to four years.

Without an approved indirect cost rate, CAA may not fully claim reimbursement of indirect costs under its federal awards, thereby increasing reliance on other funds, including general funds, to pay for costs that otherwise may have been reimbursed by the federal government.

Recommendation 1. Submit indirect cost rate proposals and/or negotiate predetermined rates in accordance with OMB Circular A-87 to ensure compliance with requirements to claim reimbursement for the indirect costs of programs funded under federal awards.

Management Response

CAA does not concur with the aforementioned finding because the department currently maximizes the administrative rate allowed by each grant and funding source. Moreover, it is important to note that some grant sources allow indirect cost to be charged while others do not. Due to funding provided by CAA's funders, indirect costs are not budgeted or charged to all grants that do allow these charges. Below are some of the grants in CAA:

- *United States Department of Health and Human Services (HHS) grant - This grant provides funding for the Head Start/Early Head Start Program. The grant has an administrative rate of 15% for both cash and in-kind contributions. Currently, CAA utilizes the indirect cost expense as in-kind to meet the grant's 25% required match of which the administrative rate (cash and in-kind) must not exceed 15%.*

- *Low Income Home Energy Assistance Program (LIHEAP) - This grant provides funding to assist low-income residents with their home energy bills. The administrative rate allowed for this grant is maximized. Additionally, the funding is restricted to the salaries of employees that work 100% in the program*

- *Community Service Block Grant (CSBG) - This grant's administrative rate is maximized and allows for indirect cost to be charged. Minimal indirect cost expenses can be charged to this grant due to the limited funding received by the Department and the associated program management expenses.*

Commission Auditor Comments

Submission of indirect cost rate proposals and/or negotiation of predetermined rates can improve awareness of program costs and optimize reimbursements under federal awards.

B. Program Administration and Service Delivery

Finding 2.1. Improvements are needed in WAP-LIHEAP project file documentation and program reporting.

OCA randomly selected ten clients' files (five each from FY 2007-08 and FY 2008-09) and reviewed them for completeness and compliance with program reporting. Some examples we observed from the ten reviewed files included:

(1) Incomplete documentation in project files.

Of the ten files:
- One did not have a Pre-Work Order Agreement (PWOA) form;
- Two task sheets did not indicate tasks performed at project site; and
- One PWOA form was unsigned.

The State WAP procedures and guidelines and CAA Energy Division's procedures require a duly signed PWOA to document all work to be completed for each dwelling served. The PWOA is to be maintained in each client's files for monitoring and review. To fulfill the WAP requirements, the Energy Division's procedures require employees working on project to complete a daily task sheet and the crew chief/employee to turn in the completed sheet daily per house.

The PWOA form is critical to communicating project scope to the client prior to project work performance. Failure to have the client sign the PWOA form could give the client grounds to dispute the scope of work done in relation to his/her expectations.

(2) Insufficient proofs of compliance with program reporting requirements.

CAA could not provide evidence of submission of the "Success Story Reports" and the "Semi-Annual Leveraging Reports" for FY 2007-08 and FY 2008-09 to the Department of Community Affairs in compliance with State WAP Procedures and Guidelines. WAP Procedures and Guidelines call for these reports on program successes and leveraging efforts to be submitted at least twice during the program year and are due on April 15th and October 15th.

CAA could only provide proof of one submittal of the WAP "Household Quarterly Report" for FY 2007-08 and FY 2009-10.

CAA was also unable to provide documentation as proof that evaluation of energy savings was reported. WAP requires that the agency document and report energy savings attained through program services. This is to be done by comparisons of at least five clients' most recent utility bills prior to commencement of weatherization work and post-weatherization utility bills for the same clients, sixty days after the completion of work. Of the ten files reviewed for FY 2007-08 and FY 2008-09, none had post-weatherization project utility bill evaluation reports.

Not complying with program reporting requirements could subject the agency to sanctions from the program sponsor.

Recommendation 2.1. Strengthen internal controls for tracking project file documentation and program reporting that will ensure compliance with program requirements.

Management Response

Finding 2.1
CAA concurs with the finding, however, it is important to note that files identified and audited pre-dated the case file review process implemented by the department in 2009 and currently in effect to help ensure the completeness of WAP case files.

Finding 2.1(2)
CAA does not concur with the finding regarding compliance with the submittal of the "Success Story Report", the "Semi-Annual Leveraging Report" and the WAP "Household Quarterly Report". All reports have been accounted for as received by the State of Florida Department of Community Affairs (DCA), according to the program representative...

It is important to note that the program has been monitored by DCA each year and has not been cited for failing to comply with program reporting requirements, to include late or sporadic submission of report.

Furthermore, over the past three years, the Energy Programs Division has undergone extensive restricting in both programmatic processes and managerial staff, to include a new Division Director and program supervisors. Consequently, these enhancements have resulted in a greater degree of compliance and program efficacy.

Commission Auditor Comments

The requested reports were not made available for review by OCA auditors during the fieldwork. Of the ten WAP project files reviewed by OCA auditors, none had the required post-weatherization project utility bill evaluation report, and several were missing other required documentation. We note that CAA's response includes an action plan addressing this finding [CAA Action Plan, pages 1 through 2 of 7].

Finding 2.2. Improvements are needed in evaluations of clients' homes and in documentation of agreements with clients prior to commencement of WAP work.

OCA noted instances where clients were unsatisfied with quality of work performed on their property largely due to inadequate evaluation prior to start of project execution, which then led to a mismatch between clients' expectations and project scope. Florida WAP procedures and guidelines require inspection and evaluation to determine whether weatherization work should be performed and to avoid inheriting a problem that cannot be addressed within the scope of the program.

One example is a complaint filed by a client stating water leakage was experienced after CAA installed a new hot water tank under the WAP-LIHEAP. Post-project completion inspection by CAA established that the cause of water leakage was defective plumbing. A comprehensive evaluation prior to commencement of work would have detected and documented the defective plumbing prior to installation of hot water tank, and the client would have been informed of the effects of installing a new water tank.

Recommendation 2.2. Prior to commencement of work, ensure thorough evaluations of relevant conditions at clients' homes, and better document agreements with clients on project scope and on pertinent preexisting conditions.

Management Response

CAA does not concur with the finding and asserts that the Auditor's recommendation that the program improve its evaluation process is not founded.

It is important to note that the Weatherization Assistance Program (WAP) guidelines include a very rigid assessment process that prioritizes the application of customers seeking assistance based on the work that has to be done to each home to ensure the customer receives the maximum benefit from the resources provided. Given that DCA has mandated a highly technical evaluation tool, the Program is not at liberty to deviate from the prescribed evaluation tool's use or its processes. To do so would invariably result in non-compliance and possibly jeopardize program funding. Further, this finding is seemingly based on the following two erroneous assumptions:

1) The program has the authority to develop and implement its own evaluation processes and mechanisms; and

2) The client's plumbing problems are a result of the work performed by the program.

It is also important to note that all WAP Inspectors are required to undergo a mandatory State of Florida training, successfully pass a competency examination, and be certified as Weatherization Auditors prior to inspecting homes. Additionally, all work is completed within the confines of the scope of service further defined by contractual stipulations and obligations. To perform work outside of these parameters is not expected nor approved by the Funder.

The Department believes that the merits of this finding lie not in whether the program changes or expands its use of the United States Department of Energy (DOE) mandated testing/evaluation tool and process, but whether or not a standardized complaint resolution process was applied to address the customer's concerns. A review of the situation in which the aforementioned finding is based has determined that it was.

Commission Auditor Comments

Our finding does not question DCA prescribed evaluation tools, qualifications of CAA Weatherization Auditors, or complaint resolution processes. Our recommendation concerns customer focus to reduce the potential for future misunderstandings and subsequent litigation.

C. General Control Environment

Information Technology (IT) General Controls

Finding 3. CAA needs a formal information security management program and needs to urgently correct identified control weaknesses for better protection of its information assets.

An information security management program is an organized plan and set of activities established by management to protect information assets against possible risks. It establishes a framework and continuous cycle of activities for assessing risk, for developing and implementing control procedures, and for monitoring the adequacy and effectiveness of these procedures. Generally Accepted Principles and Practices for Securing Information Systems[3] (GAPPSIS) recommend that management establish a security management program for effective protection of information assets.

We recognize the efforts of CAA's IT Unit in developing the Service Request System (SRS), which provided a system to enhance efficiency and to manage requests for system changes and services across CAA. Nevertheless, lack of a formal security management program in CAA creates control weaknesses that could jeopardize the confidentiality, integrity, and availability of information assets. Some of the weaknesses we noted were:

(1) CAA did not have a standard procedure in place to inform the IT Unit when an employee (permanent or temporary) separates from the agency, so that the systems access right of such employee can be promptly disabled.
   - As of March 18, 2010, we identified a user account of a former CAA employee who was terminated on January 04, 2010, but whose access rights had not been disabled in CAA's directory domain (system directory that controls access to network & computing resources).

   Leaving the access of former employee active within the information systems creates unnecessary risks of unauthorized access and disclosure of protected personal information that could be exploited with negative impacts on the CAA, its programs, and its clients.

   Actions taken

   CAA subsequently disabled this former employee's system access rights.

[3] Generally Accepted Principles and Practices for Securing Information Systems was published by the National Institute of Standards and Technology (NIST) - http://csrc.nist.gov/publications/nistpubs/800-14/800-14.pdf

(2) Known system vulnerabilities (security holes or weaknesses) were not being promptly patched or fixed. Miami Dade County Enterprise Technology Services Department (ETSD) provides a monthly report of identified systems weaknesses to CAA. Reported weaknesses should be fixed promptly to forestall their being exploited.

- Our review showed two critical vulnerabilities that ETSD reported to CAA in January 05, 2010, but that remained unfixed as of March 05, 2010.

(3) Certain incompatible duties were not segregated among IT staff. Segregation of duties is an internal control intended to prevent, detect, or minimize the occurrence of innocent errors or intentional fraud. Unnecessarily combining incompatible functions increases risks that could be avoided or reduced.

- We observed two staff members who have both database administrative functions and system administrative functions in the Childplus application (a new, web-based application for capturing, managing, and reporting data for the Head Start program.)
- Another staff member also had both application and systems programming functions.

(4) One critical application software, the Service Request System (SRS) that was developed in-house, did not have adequate documentation to facilitate its future maintenance in the event that the software developer becomes unavailable to perform these duties, whether due to transfer, illness, leave, or change in employment.

The SRS is used to manage all staff requests for services and system changes in CAA. The application is critical to service delivery and the agency is working on making the application available to its delegates.
Section 4.9.7 of the Miami Dade County Computer and Network Security Policy requires system documentation for all County systems.

(5) There were no periodic security awareness/training programs for CAA employees (including temporary and volunteers workers.)

The agency currently does not have either a first-time security awareness/training program for its new employees (including temporary and volunteer workers) or a periodic refresher training program. The Human Resources Unit confirmed there had not been any such training in the last two years.

Given the sensitivity and value of the information the agency collects, processes and stores (including personal information for individuals, families, employees, and health information for children), it is imperative that employees know and are regularly reminded of the importance of protecting these information.

GAPPSIS require that "employees should be trained in the computer security responsibilities and duties associated with their jobs." Inadequate awareness and understanding of the threats to security of information systems and how to work securely to protect information assets can result in avoidable security breaches.

Recommendation 3.1. Promptly address the specific IT control issues noted in subparagraphs (1) through (5) of Finding 3.1.

Recommendation 3.2. Develop and implement a CAA information security management program that incorporates risk assessment, design and implementation of internal controls, security education/awareness training for employees, and monitoring of the effectiveness of control procedures.

Management Response

See the attached plan [CAA Action Plan, pages 3 through 6 of 7].

Quality Improvement/Continuous Monitoring

Finding 4. Quality Improvement Reviews of CAA operations were not conducted as frequently as required by CAA operational procedures.

For FY 2008-09, we observed that the Quality Improvement Unit (QIU) did not review the activities/programs of any of CAA divisions. CAA operational procedure on Quality Improvement Review requires the unit to biannually review CAA operations, programs and their grants.

We noted that the QIU had previously been commended for the quality of its review efforts prior to FY 2008-09 by a Management Team appointed in 2007 by the County Manager to review the operations of CAA. The Management Team commented in its January 2008 interim report that "QIU is providing quality feedback to CAA on its compliance with contractual requirements and key areas of operations."

Interviews with staff attributed the recent non-compliance to a reduction in manpower from six to two full time staff members and a part-time employee.

Recommendation 4. The Quality Improvement program should be strengthened for better effectiveness. Considerations should include whether QIU operational procedures, priorities and/or staffing require revision to best enhance CAA's goals and objectives. An effective Quality Improvement program is essential both to sustain and improve quality of processes and service delivery.

Management Response

As noted in the report, the Quality Improvement (QI) Unit sustained significant impacts due to budgetary cutbacks in the department's general fund support over the past several years.

While adjustments were made internally to the approach taken by the Unit to ensure compliance by the department of its grants, those changes were not updated in the department's operational procedure at the time of the review; the procedures have since been revised to reflect a different methodology, including a reduction in the frequency and scale of monitoring conducted by the QI Unit.

Attachment 1

Memorandum

MIAMI-DADE COUNTY

Office of the

JAN 07 2011

Commission Auditor

Date: January 5, 2011

To: Charles Anderson, CPA
Commission Auditor

From: Julie Edwards, Executive Director
Community Action Agency

Subject: Final Draft: Review of Community Action Agency Operations

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Thank you for the opportunity to respond to your report dated December 6, 2010, regarding the Commission Auditor's review of Community Action Agency (CAA) and its operations. The department acknowledges the issues/concerns identified in the report and has already initiated measures to address the concerns as appropriate. In addition to this memo, a plan of action is attached that outlines specific steps and timeframes in which the department will address the issues/concerns identified in the report. However, as noted below, a number of the findings identified are respectfully disputed on the grounds hereinafter enumerated:

Finding 1:
Additional federal funds may be available to reimburse indirect costs of programs funded by federal awards.

CAA's Response
CAA does not concur with the aforementioned finding because the department currently maximizes the administrative rate allowed by each grant and funding source. Moreover, it is important to note that some grant sources allow indirect cost to be charged while others do not. Due to funding provided by CAA's funders, indirect costs are not budgeted or charged to all grants that do allow these charges. Below are some of the grants in CAA:

- United States Department of Health and Human Services (HHS) grant - This grant provides funding for the Head Start/Early Head Start Program. The grant has an administrative rate of 15% for both cash and in-kind contributions. Currently, CAA utilizes the indirect cost expense as in-kind to meet the grant's 25% required match of which the administrative rate (cash and in-kind) must not exceed 15%.

- Low Income Home Energy Assistance Program (LIHEAP) - This grant provides funding to assist low-income residents with their home energy bills. The administrative rate allowed for this grant is maximized. Additionally, the funding is restricted to the salaries of employees that work 100% in the program.

- Community Service Block Grant (CSBG) - This grant's administrative rate is maximized and allows for indirect cost to be charged. Minimal indirect cost expenses can be charged to this grant due to the limited funding received by the Department and the associated program management expenses.

Finding 2.1
Improvements are needed in WAP-LIHEAP project documentation and program reporting.

CAA's Response
CAA concurs with the finding, however, it is important to note that files identified and audited pre-dated the case file review process implemented by the department in 2009 and currently in effect to help ensure the completeness of WAP case files. Further clarification is included in the attached.

Finding 2.1(2)
Insufficient proofs of compliance with program reporting requirements

CAA's Response
CAA does not concur with the finding regarding compliance with the submittal of the "Success Story Report", the "Semi-Annual Leveraging Report" and the WAP "Household Quarterly Report". All reports have been accounted for as received by the State of Florida Department of Community Affairs (DCA), according to the program representative Michael Rowe. Furthermore, in conferring with Mr. Rowe, he advised that if program reports had not been received pursuant to program requirements, Miami-Dade County would have received a notice of non-compliance.

It is important to note that the program has been monitored by DCA each year and has not been cited for failing to comply with program reporting requirements, to include late or sporadic submission of reports.

Furthermore, over the past three years, the Energy Programs Division has undergone extensive restructuring in both programmatic processes and managerial staff, to include a new Division Director and program supervisors. Consequently, these enhancements have resulted in a greater degree of compliance and program efficacy.

Further clarification is included in the attached plan to address the proof of evaluation of energy savings reports.

Finding 2.2:
Improvements are needed in evaluations of clients' homes and in documentation of agreements with clients prior to commencement of WAP work.

CAA's Response
CAA does not concur with this finding and asserts that the Auditor's recommendation that the program improve its evaluation process is not founded.

It is important to note that the Weatherization Assistance Program (WAP) guidelines include a very rigid assessment process that prioritizes the application of customers seeking assistance based on the work that has to be done to each home to ensure the customer receives the maximum benefit from the resources provided. Given that DCA has mandated a highly technical evaluation tool, the Program is not at liberty to deviate from the prescribed evaluation tool's use or its processes. To do so would invariably result in non-compliance and possibly jeopardize program funding. Further, this finding is seemingly based on the following two erroneous assumptions:

1) The program has the authority to develop and implement its own evaluation processes and mechanisms; and

2) The client's plumbing problems are a result of the work performed by the program.

It is also important to note that all WAP Inspectors are required to undergo a mandatory State of Florida training, successfully pass a competency examination, and be certified as Weatherization Auditors prior to inspecting homes. Additionally, all work is completed within the confines of the scope of service further defined by contractual stipulations and obligations. To perform work outside of these parameters is not expected nor approved by the Funder.

The Department believes that the merits of this finding lie not in whether the program changes or expands its use of the United States Department of Energy (DOE) mandated testing/evaluation tool and process, but whether or not a standardized complaint resolution process was applied to address the customer's concerns. A review of the situation in which the aforementioned finding is based has determined that it was. Moreover, the secondary clause of this finding is redundant of the issue enumerated in Finding 2.1

Finding 3.1 (1) – 3.1 (5):
CAA needs a formal information security management program and needs to urgently correct identified control weaknesses for better protection of its information assets.

CAA's Response
See the attached plan.

Finding 4
Quality Improvement Reviews of CAA operations were not conducted as frequently as required by CAA operational procedures.

CAA's Response
As noted in the report, the Quality Improvement (QI) Unit sustained significant impacts due to budgetary cutbacks in the department's general fund support over the past several years.

While adjustments were made internally to the approach taken by the Unit to ensure compliance by the department of its grants, those changes were not updated in the department's operational procedure at the time of the review; the procedures have since been revised to reflect a different methodology, including a reduction in the frequency and scale of monitoring conducted by the QI Unit. Further clarification is provided in the attached plan.

I look forward to your response and working collaboratively to ensure that the Community Action Agency continues to deliver excellence and provide quality services to our most vulnerable residents.

Should you need additional information/clarification, please do not hesitate to contact me at 786-469-4613.

C: Howard Piper, Special Assistant to the County Manager
Dr. William Zubkoff, CAA Board Chair
Abigail Price-Williams, First Assistant County Attorney

MIAMI-DADE COUNTY

Miami-Dade County Community Action Agency's Action Plan

Division: ENERGY PROGRAM

(CAR) REPORT FINDING	ACTION PLAN	Date of Implementation	Responsible Person(s)	Targeted Date of Completion
Finding 2.1: Improvements are needed in WAP-LIHEAP project file documentation and program reporting. (1) Incomplete documentation in file.	1. Develop and implement written policies and procedures that outline program requirements for file documentation and reviews.	January 3, 2011	Ana Perez Karen Alexander	January 31, 2011 Ongoing
	2. Supervisor will continue to conduct case file reviews for 100% of customer files to ensure accuracy and completion of information	January 2009	Karen Alexander	Ongoing
	3. Will continue to document all case file reviews using the State required case file review checklist and ensure appropriate placement in client case file.	January 2009	Karen Alexander	Ongoing
	4. Additional review of case files will continue to be performed by the Weatherization Manager to ensure compliance with program requirements.	January 2009	Alfred Consuegra	Ongoing
	5. Department of Community Affairs contracted Monitor will continue to conduct monthly reviews of 100% of case files to ensure program compliance.	January, 2010	Alfred Gonzalez, DCA/WAP Field Monitor, Skyetec	Ongoing

MIAMI-DADE COUNTY

Miami-Dade County Community Action Agency's Action Plan

Division: ENERGY PROGRAM

(CAR) REPORT FINDING	ACTION PLAN	Date of Implementation	Responsible Person(s)	Targeted Date of Completion
Finding 2.1(2): (2) Insufficient proofs of compliance with program reporting requirements.	1. The due dates for all WAP reports will be entered into the Microsoft Outlook Calendars of the Division Director, Asst. to the Division Director, the Weatherization Manager that include a reminder to ensure compliance with program reporting requirements, including the energy savings report.	Immediately	Ana Perez	December 30, 2010
	2. Electric bill savings, for at least 5 clients, have been collected from FPL, compared, and reported in the Semi Annual Success Reports since April 2009. In September, CAA expanded the data collection to include almost all homes completed. To date we have collected data on 77 clients	April 2009	Karen Alexander Ana Perez	March 31, 2011, and, as required thereafter

MIAMI-DADE COUNTY

Miami-Dade County Community Action Agency's Action Plan

Division: Information Technology Unit

(CAR) REPORT FINDING	ACTION PLAN	Date of Implementation	Responsible Person(s)	Targeted Date of Completion
Finding 3.1(1): CAA needs a formal information security management program and needs to urgently correct identified control weaknesses for better protection of its information assets. (1)CAA did not have a standard procedure in place to inform the IT Unit when an employee (permanent or temporary) separates from the agency, so that the systems access right of such employee can be promptly disabled.	• Review the current Miami-Dade County Enterprise Technology Services Department's (ETSD) policy as it relates to finding	December 30,2011	Delia Iglesias Jaime De La Pava	January 7, 2011
	• Develop Policy and Procedure to comply with ETSD's processes for the issuance of access rights and revocation of access rights upon separation.	January 10,2011	Delia Iglesias Jaime De La Pava	January 24,2011
	• Develop module for cross training of applicable staff.	January 10,2011	Delia Iglesias Jaime De La Pava Elizabeth Diaz	January 24,2011
	• Submit draft policy to Human Resource (HR) & Quality Improvement Unit (QIU) for review and comment.	January 24,2011	Delia Iglesias Jaime De La Pava	January 24,2011
	• Transmit Policy and Procedure to CAA Executive Director for review and approval and implementation.	January 28, 2011	Delia Iglesias	January 28, 2011
	• Train applicable CAA Staff/notify all CAA staff of Policy/Procedure and effective date of implementation.	February 7, 2011	Delia Iglesias Jaime De La Pava & Elizabeth Diaz	February 11,2011
	• Monitor for compliance	March 1, 2011	Delia Iglesias	Ongoing

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(CAR) REPORT FINDING	ACTION PLAN	Date of Implementation	Responsible Person(s)	Targeted Date of Completion
Finding 3.1(2): (2)Known system vulnerabilities (security holes or weaknesses) were not being promptly patched or fixed.	• Review the current ETSD policy as it relates to finding.	December 30, 2011	Delia Iglesias Jaime De La Pava	January 7, 2011
	• Develop Policy and Procedures to comply with ETSD's procedure for patching or fixing system vulnerabilities.	January 10, 2011	Delia Iglesias	January 24, 2011
	• Develop module for cross training of applicable staff.	January 10, 2011	Delia Iglesias Jaime De La Pava & Elizabeth Diaz	January 24, 2011
	• Submit Policy and Procedure to CAA's (QIU) for review and comment.	January 24, 2011	Delia Iglesias	January 24, 2011
	• Transmit policy and procedures to CAA Executive Director for approval and implementation.	January 28, 2011	Delia Iglesias	January 28, 2011
	• Train applicable CAA staff to repair system vulnerabilities.	February 7,2011	Delia Iglesias	February 11, 2011
	• Monitor for compliance by reviewing the Vulnerability Report generated by ETSD and taking appropriate action(s).	Immediately	Delia Iglesias	Ongoing

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(CAR) REPORT FINDING	ACTION PLAN	Date of Implementation	Responsible Person(s)	Targeted Date of Completion
Finding 3.1(3): (3)Certain incompatible duties were not segregated among IT staff. Segregation of duties is an internal control intended to prevent, detect, or minimize the occurrence of innocent errors or intentional fraud. Unnecessarily combining incompatible functions increases risks that could be avoided or reduced.	• Review and analyze current workloads of IT Supervisor and IT Technicians. • Determine feasibility of assigning programming functions to recently absorbed Sr. Systems Analyst to facilitate segregation of tasks. • Amend job descriptions where applicable to segregate programming and technician functions.	January 10, 2011 January 10, 2011 January 19, 2011	Bolane Shorunke-Jean Betty Bennett Bolane Shorunke-Jean Delia Iglesias Bolane Shorunke-Jean Delia Iglesias	January 17, 2011 January 17, 2011 January 31, 2011
Finding 3.1(4): (4)One critical application software, the Service Request System (SRS) that was developed in-house, did not have adequate documentation to facilitate its future maintenance in the event that the software developer becomes unavailable to perform these duties, whether due to transfer, illness, leave, or change in employment.	• Review the current ETSD policy as it relates to independent software development and use. • Develop database dictionary for the Service Request System (SRS). • Develop module for cross training of applicable staff. • Submit (SRS) System Policy and Procedure and cross training module to CAA's Quality Improvement Unit (QIU) for review. • Transmit Policy and Procedure to CAA Executive Director for approval and implementation. • Train applicable CAA staff. • Monitor for compliance	December 30, 2011 November, 2010 January 10, 2011 January 25, 2011 January 28, 2011 February 7, 2011 Immediately	Delia Iglesias &Jaime De La Pava Delia Iglesias Jaime De La Pava Delia Iglesias Jaime De La Pava Jaime De La Pava Delia Iglesias Delia Iglesias Jaime De La Pava Delia Iglesias Delia Iglesias	January 7, 2010 November, 2010 (completed) January 24, 2011 January 25, 2011 January 26, 2011 February 7, 2011 Ongoing

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(CAR) REPORT FINDING	ACTION PLAN	Date of Implementation	Responsible Person(s)	Targeted Date of Completion
Finding 3.1(5): (5)The agency currently does not have either a first-time security awareness/training program for its new employees (including temporary and volunteer workers) or a periodic refresher training program.	• Review the current ETSD policy as it relates to finding.	December 27, 2011	Delia Iglesias &Jaime De La Pava	January 7, 2011
	• Develop Policy and procedure to comply with ETSD to address security awareness/training.	January 10, 2011	Delia Iglesias	January 24, 2011
	• Develop training module for new CAA employees and periodic refresher training for current CAA employees	January 10, 2011	Delia Iglesias Jaime De La Pava Elizabeth Diaz	January 24, 2011
	• Submit policy and procedures to CAA's Quality Assurance Unit (QAU) for review	January 24, 2011	Delia Iglesias	January 28, 2011
	• Transmit policy and procedures to CAA Executive Director for approval and implementation	January 28, 2011	Delia Iglesias	January 28, 2011
	• Train applicable CAA staff in a refresher course.	February 7, 2011	Delia Iglesias Elizabeth Diaz	February 11, 2011
	• Monitor for compliance	March 1, 2011	Jaime De La Pava Delia Iglesias	Ongoing

Division: Quality Improvement Unit

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(CAR) REPORT FINDING	ACTION PLAN	Date of Implementation	Responsible Person(s)	Targeted Date of Completion
Finding 4: Quality Improvement Reviews of CAA operational procedures.	1. Amend policies and procedures to reflect current monitoring practice.	January 3, 2011	Betty Bennett	January 14,2011
	2. Explore alternative continuous quality improvement (CQI) and select appropriate process to ensure internal monitoring of service divisions.	January31, 2011	Betty Bennett Lisa Emmanuel	February 21, 2011
	3. Develop (CQI) training curriculum and provide training to division directors and designated staff for implementation of (CQI) process.	March 1, 2011	Betty Bennett Lisa Emmanuel	March 31, 2011