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December 2022

DeKalb County Government

PROBATE COURT

**AUDIT OF THE TERMINATION AND
TRANSFER OF EMPLOYEES
PROCESS**

FINAL REPORT

Audit Report No. IA-2022-077-IT

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PROBATE COURT
AUDIT OF TERMINATION AND
TRANSFER OF EMPLOYEES PROCESS
REPORT NO. IA-2022-077-IT

FINAL

HIGHLIGHT SUMMARY

Why We Performed the Audit

In accordance with the Office of Independent Internal Audit (OIIA) annual audit plan, we conducted a performance audit of the termination and transfer of employees process within the Probate Court. The purpose of the audit was to evaluate the effectiveness of the procedures and processes specifically related to the disabling and updating of terminated and transferred employees' access to County applications and networks.

The Probate Court utilizes the Odyssey application to streamline the case and document workflow, financial assessments and collections, calendars and caseload management, Eagle an integrated land and official records management solution, and eFileGA an electronic filing solution to process cases and licenses that involve the County residents' sensitive data that require optimized data security. The timely deactivation of terminated employees and transferred employees' user access on these applications and the County network is critical to the security of sensitive citizens' information. Gaps and weaknesses in the controls would be an opportunity for unauthorized access and breach of data that could result in reputational, regulatory, and or financial loss to the County.

According to a recent *Chief Information Officers' Leadership insights report*, 20% of organizations experienced data breaches by former employees. Of those, 47% admitted that ex-employees have been responsible for more than 10% of all their data breaches¹.

How We Performed the Audit

The audit focused on the period of January 1, 2020, through December 31, 2021. Our methodology included, but was not limited to the following:

- Reviewed the policies and procedures relating to the Termination and Transfer of Employees process and related best practices.
- Selected and tested a sample of termination and transfer activities.
- Conducted a walkthrough of the Termination and Transfer of Employees process.
- Interviewed the concerned stakeholders.

Background

The Dekalb County Probate Court carries out the duties assigned to it under the Constitution and laws of Georgia as a Court of Record with exclusive jurisdiction over Marriage Licenses, Wills, Administrations, Year's Support, Temporary Guardianship of Minor, Minor, and Adult Guardianships/Conservatorships, and Weapons Carry License. On average the court handles about 3,664 probate wills, administration of estates and petitions, issues, and certifies about 12,673 marriage license certificates, issues 6,282 first-time and 2,594 renewals of weapon carry licenses, handles about 287 adult and 312 minor guardianships and conservatorship cases yearly.

What We Found

The audit noted that the Probate Court has a good practice of maintaining the records of terminated and transferred employees. They use the Human Resource Administrative Policies and Procedures as a guide for the termination and transfer process. The three major applications (Odyssey, Eagle, and eFileGA) are managed by court personnel.

| Audit Findings | Results |
|--|--|
| 1. Untimely Deactivation of System Access of Terminated and Transferred Employees on Odyssey, Eagle, and eFileGA Applications. | |
| 2. Non-Performance of Periodic Reviews of User System Access. | |
| 3. Untimely Deactivation of Network Access for Terminated Employees. | |
| | No exceptions were noted. |
| | Recommendation to enhance internal controls. |
| | Internal control exception noted requiring action. |

What We Recommend

We recommend that the Probate Court management collaborates with the Human Resource and Merit System Department (HR) and the Department of Innovation and Technology (DoIT) to address the control process deficiencies identified in this report.

How Management Responded

Management agrees with the exceptions noted.

¹ <https://www.ciointersight.com/security/ex-employees-still-cause-data-breaches/>



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BACKGROUND AND INTRODUCTION

The mission of the DeKalb County Probate Court is to carry out the duties assigned to it under the Constitution and laws of Georgia as a Court of Record with exclusive jurisdiction over Marriage Licenses, Wills, Administrations Year Support, Temporary Guardianship of Minors, Minors, and Adult Guardianships/Conservatorships, and Weapons Carry License. On average the court handles about 3,664 probate wills, administration of estates and petitions, issues, and certifies about 12,673 marriage license certificates, issues 6,282 first-time and 2,594 renewals of weapon carry licenses, handles about 287 adult and 312 minor guardianships and conservatorship cases yearly. The court utilizes the Odyssey application to streamline the case and document workflow, financial assessments and collections, calendars and caseload management, Eagle an integrated land and official records management solution, and eFileGA an electronic filing solution application to process cases and licenses that involve the County residents' sensitive data and some Personally Identifiable Information (PII).

Why this Audit Was Performed

The Court collects various types of PII through application processes such as name, date of birth, address, driver's license, mobile or email, and social security number. Even though there had not been material breaches to the applications during the audit scope, the audit was conducted to assess any existence of system access exposures that could be exploited in the future as it relates to de-provisioning of the accesses when no longer required. Additionally, the County network is the first line of defense for system access to County-wide processes and information. The administration of system access to these applications is managed by the Probate Court. The Probate Court also collaborates with HR, and the DoIT when its employees are terminated or transferred.

The timely and complete deactivation of terminated employees and transferred employees on these applications and the County network is critical to the security of sensitive information of citizens. According to the Chief Information Officers' Leadership insights (CIO Insight) report, 20% of organizations experienced data breaches by former employees. Of those, 47% admitted that ex-employees have been responsible for more than 10% of all their data breaches.²

Our Scope and Objectives

The focus of this audit was to evaluate the effectiveness of the termination and transfer processes as it relates to the de-provisioning (i.e., deactivation and removal) of employee user access from the County network and Odyssey, Eagle, and eFileGA applications that are managed by the DeKalb County Probate Court. To prevent and detect improper use of data and computer systems, effective logical access controls (authentication and authorization) should be in place to ensure that user access is appropriate given the current roles and responsibilities. Gaps and weaknesses in the controls would be an opportunity for unauthorized access to data or data breaches which could result in reputational, operational, and regulatory loss to the County.

² <https://www.cioinsight.com/security/ex-employees-still-cause-data-breaches/>



The main document that guides the termination and transfer of employees process is the HR Administrative Policies & Procedures along with other process documents like the Personnel Action (PA2) form, the Inventory, and Separation Notice forms. Together these documents guide the following:

- Deactivation of an employee's access to the company's network and computer systems immediately upon termination of their employment.
- Modifying employee access upon transfer to another department within the organization.

AUDIT RESULTS

Our audit procedures included discussions with key stakeholders and management staff and tests of transactions to assess the effectiveness of the termination and transfer of employees' process with a focus on application system access. We noted that the Probate Court utilized the Human Resource Administrative Policies and Procedures as a guide for the termination and transfer process. The audit observed the HR policies and procedures are not complete as they do not address some aspects of the termination and transfer process related to system access. The details and recommendations of this observation are being communicated to the HR department in a separate audit report covering departments within the direction of the County administration. The audit also noted that the Probate Court has a good practice of maintaining the records of terminated and transferred employees in the Court. We noted opportunities for improvement in the Court's processes for de-provisioning users who have been terminated or transferred out and no longer require the same level of access.

The detailed findings and corresponding recommendations are outlined in this report.

Finding 1: Untimely Deactivation of System Access of Terminated and Transferred Employees on Odyssey, Eagle, and eFileGA Applications.

During the audit, we discussed the procedures for deactivating timely the Odyssey, Eagle, and eFileGA users' system access when no longer needed. We noted that there were no documented Court procedures for this process. Additionally, we observed that:

Odyssey

- 6 of 6 (100%) sampled terminated users' system access was not deactivated timely from the Odyssey application in (3 to 104 days after the effective termination date).
- 2 of 3 (67%) transferred employees' system access was not timely deactivated (3 to 126 days after the effective transfer date).

Eagle

The deactivation dates for users who no longer require access were not provided, so we **could not determine** if system access was deactivated timely for:

- 3 of 6 (50%) sampled terminated users
- 2 of 3 (67%) transferred users.



eFileGA

- 2 of 6 (33%) sampled terminated and 1 of 3 (33%) transferred users' system access had been deactivated but no deactivation dates were provided, therefore we could not determine whether system access was deactivated timely.

We also assessed if the department adhered to the HR guide expectations regarding notifying the HR of terminated employees within 1-3 business days of the effective termination date. We determined that:

- The HR department was not notified timely (9 -11 days after the effective termination dates).
- The notifications to the department's System Administrator and DoIT requesting that the users' accounts in Odyssey, Eagle, and eFileGA applications and the network be disabled were not provided for the sampled terminated and transferred users.

Recommendation:

We recommend that the Probate Court management should:

- Collaborate with HR and DoIT management to develop a formal procedure for the removal of user access to the applications, including the timeliness of HR notifications.
- Adhere to the HR termination guide that indicates the timeline for notification of the effective date of termination or transfer of employees.
- Deactivate terminated or transferred users' accounts immediately from the applications as stated by best practices such as the National Institute of Standards and Technology (NIST), the Payment Card Industry Data Security Standard (PCI-DSS), and Control Objectives for Information and related Technology (COBIT).
- Collaborate with the applications' vendors to ensure the dates of deactivation of access on Eagle, and eFileGA application systems users' reports are periodically generated for review.

Management Response (Probate Court Management):

| <i>Management Agreement</i> | <i>Description of Management's Action Plan to Address Finding</i> | <i>Estimated Timeline to implement Action Plan</i> |
|--|--|--|
| <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree | <ul style="list-style-type: none"> • Probate Court will create a standard operating procedure for deactivating terminated and transferred employees' access to Odyssey, Eagle, and eFileGA. • Probate Court System Administrator will create a tool to track the deactivation of user access | Two Months after the final audit report issue. |
| <p><i>Reason For Disagreement:</i></p> | | |



Finding 2: Non-Performance of Periodic Reviews of User System Access.

During the audit, we interviewed management to determine procedures for the periodic review and validation of users and roles in the Odyssey, Eagle, and eFileGA applications and noted that procedures did not exist. Management also confirmed that they do not perform periodic reviews of user access on the applications.

Recommendation:

We recommend that the Probate Court management coordinate with DoIT and HR management to:

- Establish a standard operating procedure for the review of users’ access and roles on the Odyssey, Eagle, and eFileGA applications. The procedure should include but is not limited to:
 - The identification, roles, and responsibilities of the review managers conducting the review and other stakeholders.
 - The required reports are needed for a complete review of the users.
 - The criteria, guidelines, and documentation required to be maintained to support the review.
 - The period, duration, and frequency of the review.
 - The procedures for addressing and validating recommendations made during the review.

- Establish a procedure for routine training of the reviewing officers to ensure that accurate and appropriate user system access reviews are carried out.
- Include Probate Court administration on the distribution list for termination and transfer reports. Or grant the ability for Probate Court administration to generate these reports from CV360 (County Personnel Management Application).

Management Response (Probate Court Management):

| <i>Management Agreement</i> | <i>Description of Management's Action Plan to Address Finding</i> | <i>Estimated Timeline to Implement Action Plan</i> |
|--|--|--|
| <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree | <ul style="list-style-type: none"> • Probate Court System Administrator will perform a review of user access on the Odyssey, Eagle, and eFileGA applications on the first of each month. • Probate Court System Administrator will document the findings and submit them to the Probate Court Associate Judge for review. • Probate Court HR Coordinator will contact County HR about obtaining access to termination and transfer reports. | One month |
| <i>Reason For Disagreement:</i> | | |



Finding 3: Untimely Deactivation of Network Access for Terminated Employees.

During the audit, we reviewed the procedures for deactivating County network access of terminated employees. We noted that there were no Countywide documented procedures.

Additionally, we reviewed the terminated users lists from HR and compared them with the list of active users on the network to verify if network access was deactivated.

Further, we verified how timely the 14 terminated employees' County network accounts, within the audit period, were deactivated. We observed that:

- 4 of 14 (29%) terminated employees were not on the list of disabled or active network accounts so we could not determine when their access was deactivated.
- 7 of 14 (50%) terminated employees' network access was not deactivated timely (4 - 66 days after the termination date) from the network.
- 3 of 14 (21%) terminated employees' network access **was** deactivated timely.

We also reviewed the procedures for removing transferred users from their old email distribution and security groups to the new email distribution and security groups. Security groups are used for managing access rights and permissions to resources such as network drives and SharePoint sites in an organization while distribution groups are used for sending email notifications that are specific/unique to a group of people in an organization.

We observed that:

- For 2 of 3 (67%) transferred employees the date they were removed from the Probate Court email distribution group was not indicated on the email distribution list.
- 1 of 3 (33%) transferred employees' access to the Probate Court security group was not disabled timely (9 days after transfer), and no removal date was indicated for one transferred employee.

Recommendation:

We recommend that the Probate Court's management collaborate with the HR and Department of Innovation and Technology to:

- Establish a formal procedure for the timely deactivating of terminated user network access or transferred employees' access to email distribution and security groups no longer required.
- The policy should establish specific timeframes which may vary depending on if the termination/transfer is considered "friendly" or "unfriendly" as stated in better practices such as the *NIST Special Publication 800-53: Personnel Termination PS-4*.
- Deactivate terminated employee accounts immediately from the network as stated by best practices such as the NIST, PCI-DSS, and COBIT.



Management Response (Probate Court Management):

| <i>Management Agreement</i> | <i>Description of Management's Action Plan to Address Finding</i> | <i>Estimated Timeline to implement Action Plan</i> |
|--|---|--|
| <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree | <ul style="list-style-type: none"> • Probate Court System Administrator will create an IT ticket requesting that DoIT • Deactivate the network access of the terminated employee at the same time access is being terminated on the Odyssey, Eagle, and eFileGA applications. • Probate Court System Administrator will check system in 48 hours to confirm that network access has been deactivated and follow up with DoIT if access has not been deactivated. | Immediate. |
| <p><i>Reason For Disagreement:</i></p> | | |



APPENDICES

Appendix I – Purpose, Scope, and Methodology

Purpose

The purpose of the audit was to evaluate the effectiveness of the procedures and processes specifically related to the disabling and updating of terminated and transferred employees' access to County applications and networks.

This involved:

- Review and assess the effectiveness of the policies and procedures in place guiding the termination and transfer of employees' processes.
- Determining if terminated employees' access was removed timely from the applications in scope and the County network and if transferred employees' access is modified upon transfer.
- Determine whether user access reviews are performed periodically.

Scope and Methodology:

The scope of our audit focused on the termination and transfer of employees' activities from January 1, 2020, to December 31, 2021.

Our methodology included but was not limited to the following:

- Reviewed the policies and procedures relating to the termination and transfer of employees' processes and related best practices.
- Conducted a walkthrough of the termination and transfer of employees process.
- Selected and tested a sample of termination and transfer of employees' activities.
- Reviewed supporting documentation and information.
- Interviewed appropriate Probate Court and County personnel.



Appendix II – Management Response



**Bedelia C Hargrove, Judge
PROBATE COURT OF DEKALB COUNTY
556 North McDonough
Street 1100 Judicial Tower
Decatur, Georgia 30030**

December 2, 2022

Lavois Campbell
Chief Audit Executive
Office of Independent Internal Audit
1300 Commerce Drive, Suite 300
Decatur, Georgia 30030

**RE: Management Response to Probate Court "Termination and Transfer of Employees"
Audit Report**

Dear Mr. Campbell:

In accordance with DeKalb County, Georgia - Code of Ordinances/ Organizational Act Section 10A- Independent Internal Audit, this is our response to the audit named above provided in this document. As required by the ordinance, our response includes 1) a statement regarding our agreement or disagreement along with reasons for any disagreement, 2) our plans for implementing solutions to issues identified, and 3) the timetable to complete such plans.

If you have any questions about this response, please contact Bedelia C Hargrove, Judge, Probate Court.

Sincerely,

Judge Bedelia C Hargrove
Probate Court of DeKalb County



Appendix III – Definitions and Abbreviations

Acronyms and Abbreviation

DoIT: Department of Innovation and Technology.

HR: Human Resources and Merit System

PCI-DSS: Payment Card Industry Data Security Standard.

PA2: Personnel Action Form

PII: Personally Identifiable Information.

NIST: National Institute of Standards and Technology

Key Definitions

Eagle: An integrated land and official records management solution.

eFileGA: An electronic filing solution for courts that allows users to easily open court cases and e-file documents from a single website to several Georgia courts.

Odyssey: A case management application designed to streamline the case and document workflow, financial assessments and collections, calendars, and caseload management.

CV360: A CloudVergent360 (CV360) Oracle Cloud HCM system. It is the County Personnel Management Application that was developed to provide DeKalb County users with a more streamlined and user-friendly method to access and update HR information.

De-provisioning: An access management practice of removing or deactivating user access to applications and data.

Terminated Employees: Employees whose employment with the County has ended either voluntarily or involuntarily.

Transferred Employees: Employees who transferred between departments within the County.

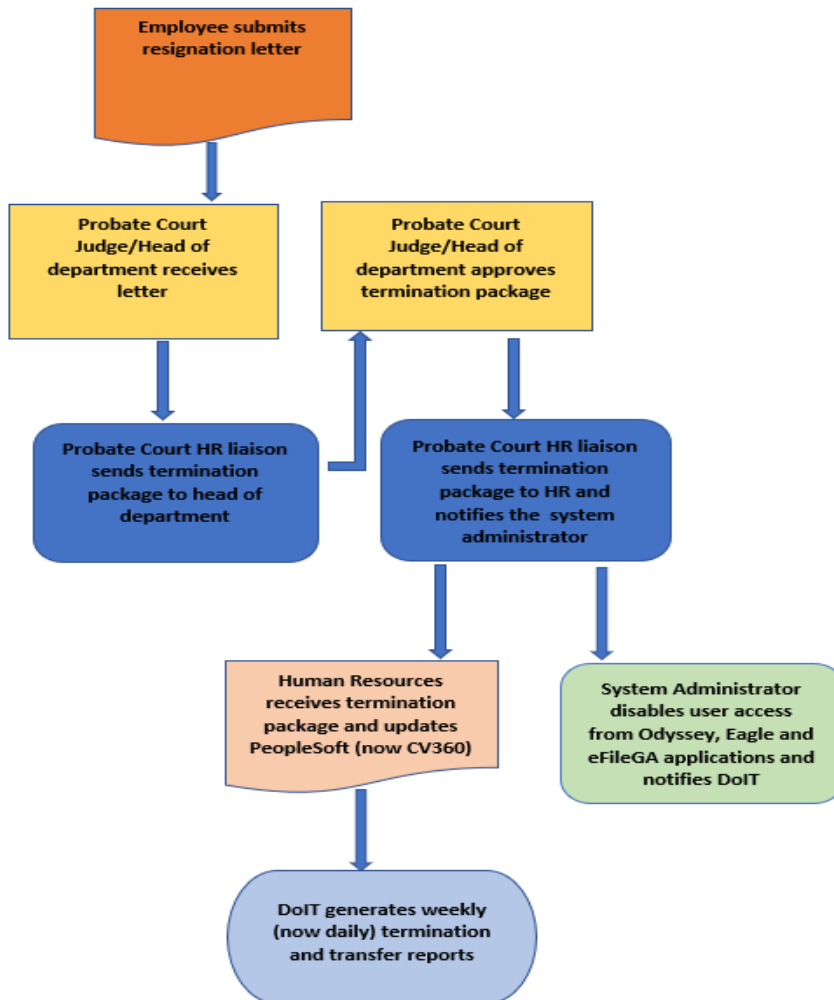
Security group: A group created in an organization to manage access permissions for all users on their various departments' folders and system resources.

Distribution group: A group created in an organization to enable a group of recipients in a specified department or unit to send and receive e-mail messages related to specific/unique department information.



Appendix IV – Process Description

The DeKalb County Probate Court’s termination process is summarized in the following flowchart:



Source: Developed from information provided by Probate Court.



DISTRIBUTION

Action Official Distribution:

Judge Bedelia Hargrove, Probate Court

Statutory Distribution:

Michael L. Thurmond, Chief Executive Officer

Robert Patrick, Board of Commissioners District 1

Jeff Rader, Board of Commissioners District 2

Larry Johnson, Board of Commissioners District 3

Steve Bradshaw, Board of Commissioners District 4

Mereda Davis Johnson, Board of Commissioners District 5

Ted Terry, Board of Commissioners District 6

Lorraine Cochran-Johnson, Board of Commissioners District 7

Adrienne T. McMillion, Chairperson, Audit Oversight Committee

Harold Smith, Jr., Vice-Chairperson, Audit Oversight Committee

Gloria G. Gray, Audit Oversight Committee

Lisa Earls, Audit Oversight Committee

Tanja Christine Boyd-Witherspoon, Audit Oversight Committee

Information Distribution:

Zachary L. Williams, Chief Operating Officer/ Executive Assistant

Vivian Ernstes, County Attorney

La'Keitha D. Carlos, CEO's Chief of Staff

Kwasi K. Obeng, Chief of Staff, Board of Commissioners

J. Caroline Freeman, Associate Judge, Probate Court of DeKalb County

John Matelski, Chief Information Officer and Director of Innovation and Technology

Benita Ransom, Director, Human Resources & Merit System Department



PROJECT TEAM

This report was submitted by:

Julie Ikioda
Julie Ikioda, CISA, PMP
IT Internal Auditor, Senior
Office of Independent Internal Audit

12/29/2022
Date

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IT Audit Manager
Office of Independent Internal Audit

12/29/2022
Date

The report was approved by:

Lavois Campbell
Lavois Campbell, CIA, CISA, CFE, CGA
Chief Audit Executive
Office of Independent Internal Audit

12.30.2022
Date



STATEMENT OF ACCORDANCE

Statement of Accordance

The mission of DeKalb County is to make the priorities of the citizens of DeKalb County; the priorities of County government - by achieving a safer DeKalb, building stronger neighborhoods, creating a fiscally accountable and more efficient county government, and uniting the citizens of DeKalb County.

The mission of the Office of Independent Internal Audit is to provide independent, objective, insightful, nonpartisan assessment of the stewardship or performance of policies, programs, and operations in promoting efficiency, effectiveness, and integrity in DeKalb County.

This performance audit was prepared pursuant to DeKalb County, Georgia – Code Ordinances/Organizational Act Section 10A- Independent Internal Audit. 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 report is intended for the use of the agency to which it was disseminated and may contain information that is exempt from disclosure under applicable law. Do not release without prior coordination with the Office of Independent Internal Audit.

Please address inquiries regarding this report to the Office of Independent Internal Audit at 404-831-7946.