Document Management Audit

Internal Audit Report

August 8, 2022

Orange County Public Schools

Internal Audit

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EXECUTIVE SUMMARY

Why We Did This Audit

Our objectives were to evaluate the efficiency and effectiveness of operations within this department and determine whether Document Management (DM) complies with School Board Policies EH-Forms Management, EHB-Data Records Retention, EBHA-Public Records Request, and JRA-Student Records, Florida Statutes and State Library and Archives of Florida as referenced in their Standard Operating Procedures (SOP). This audit was included in the 2020-2021 Audit Plan.

Observations and Conclusion

Our overall conclusion is that Document Management is operating efficiently and effectively but there were some areas that need improvement and/or streamlining to create better operational efficiencies and compliance. We commend the department for their quality control efforts within the public records request process.

Audit Results at a Glance			
	Risk / Impact Rating		
Results and Observations	**Significant**	**Moderate**	**Minor**
Source **IA - Internal Audit or** **M - Management**	**IA - 0**	**IA - 5**	**-**
Observation Category **D - Deficiency or** **O - Opportunity**	**D - 0**	**D - 5**	**-**

Results and Recommendations

During our audit we noted:

- The records management intranet site provides guidance of the paper records management storage processes but not for proper storage and disposal of electronic records.

- Disposal of public records was conducted by a vendor who operates without a contract containing performance expectations for protection of records and proper destruction processes.
- The records storage and archival tracking system was outdated and the reports pulled which track these records were not updated timely or had incorrect information.
- Several district departments maintain satellite records management systems outside guidance or involvement of the district's Records Management Liaison Officer (RMLO).
- Forms management testing revealed DM did not comply with the District's EH and SOP RM_2 with regards to forms management procedures.

We recommend the following:

- The DM department implement guidance on the intranet site regarding the storing and disposing of electronic documents in accordance with Florida Statutes
- Secure a contract with a vendor to dispose of public records which will include language regarding the proper safekeeping and disposal
- Increase qualify control efforts to ensure records sent to the warehouse for storage are recorded in real time and properly tracked within their department
- The forms management review and approval process is followed in accordance with the District's EH policy
- District departments outside the DM department with satellite records systems obtain guidance from the district's RMLO regarding the proper storage and disposal of public records in those systems.

This report has been discussed with management and they have prepared their response which follows.

DEFINITIONS:

Risk / Impact Ratings

Minor	Low risk with a financial impact of less than one percent and/or an isolated occurrence limited to local processes (low impact and low likelihood)
Moderate	Slight to moderate risk with a financial impact between one and five percent and/or a noticeable issue that may extend beyond local processes (low impact and high likelihood or high impact and low likelihood)
Significant	High risk with a financial impact greater than five percent and/or a significant issue that occurs in multiple processes and/ or noncompliance with Florida Statutes or School Board Policies (high impact and high likelihood)

We categorize risk/ impact as:
- *Minor*
- *Moderate*
- *Significant*

Observations Categories

Opportunity	A process that falls short of best practices or does not result in optimal productivity or efficient use of resources
Deficiency	A shortcoming in controls or processes that reduces the likelihood of achieving goals related to operations, reporting and compliance

We categorize our observations as opportunities or deficiencies.

Criteria for Observations Sourced to Management

- Internal audit was informed of the issue prior to starting detailed testing
- Management identified, evaluated, and communicated the issue to appropriate levels of the district
- Management has begun corrective action with clear, actionable plans and targeted completion dates

None of the observations in this report are sourced to management.

BACKGROUND:

Document Management (DM) is part of the District's Procurement department in the Operations Division. Its main responsibility is to handle all OCPS records requests, storage, retrieval, and disposal of public records within the guidelines established by Florida Statutes and the State Library and Archives of Florida. The department's Senior Administrator is the designated Records Management Liaison Officer (RMLO), and is responsible for certifying to the State that the District complies with Florida public records laws. THE RMLO is also responsible for ensuring the district follows School Board Policies EH-Forms Management, EHB-Data Record Retention, EHBA-Public Records Request, and JRA-Student Records.

Records requests handled by the department include:
- employee records requests
- media records requests
- internal records requests
- legal records requests
- subpoena records requests
- student records requests
- ESE records requests

Student records requests are not controlled by the Document Management department as each school obtains their own student records by following guidance provided to them by Document Management. However, DM stores student records within their department for release to the schools.

All other records requests are handled within DM. DM is also responsible for ensuring that PII (personal identifiable information) is not released with a public records request and as a result must redact this information before it is released. Another area of responsibility within this department is Forms Management. The purpose of this area is to establish a repository/inventory of official district forms with version control and provide an opportunity to automate, as resources allow, business processes that collect data into core systems.

Document Management handles all district records requests, storage retrieval, and disposal of public records.

The Document Management department processes a variety of public records request

Schools handle student records requests.

OBJECTIVES, SCOPE AND METHODOLOGY:

Objectives

Our objectives were to evaluate the efficiency and effectiveness of operations within this department and determine whether Document Management (DM) complies with School Board Policies EH-Forms Management, EHB-Data Records Retention, EBHA-Public Records Request, and JRA-Student Records, Florida Statutes and Florida Archives Library as referenced in their Standard Operating Procedures (SOP).

Scope

The scope of the engagement was from July 1, 2021 to June 30, 2022 but we reviewed documents that were older due to the nature of the records storage, retention, archival and destruction processes.

Methodology

Our audit methodology consisted of a planning phase in which we interviewed the Management team, gathered information on the department's Standard Operating Procedures (SOP's), reviewed applicable Florida Statutes and Florida Archives Library, and the district policies related to document management, conducted a walk-through of the facilities, and gained an understanding of the DM process. We tested transactions and activity to determine whether the department complies with their Standard Operating Procedures, EH, EHB, EHBA, and JRA effectively and efficiently. We conducted fact finding and benchmarking with departments within the district who own some form of records management software and provided a summary of the results.

We conducted this audit in accordance with the International Standards for the Professional Practice of Internal Auditing of the Institute of Internal Auditors and included such procedures as deemed necessary to provide reasonable assurance regarding the audit objective. Internal Auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. It helps an organization accomplish its

Our scope included the period from July 1, 2021 through June 30, 2022.

We conducted this audit in accordance with the International Standards for the Professional Practice of Internal Auditing.

objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

We are required to note any material deficiencies in accordance with Florida Statutes, School Board Policy and sound business practices. No material deficiencies were noted in this audit. We also offer suggestions to improve controls or operational efficiency and effectiveness.

No material deficiencies were noted in this audit.
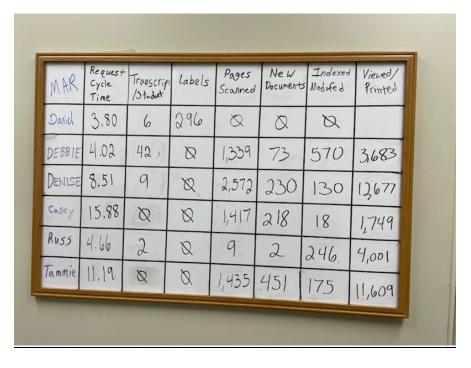
COMMENDATION:

During our visit to the Document Management department, we noticed several large boards on the wall which track their business processes. The first one, shown below, tracked "Record Requests Received."

We commend Document Management for tracking and posting their business processes.

Records requests received, cycle times and labels processed.

The second one, on the next page, tracked "Request Cycle Time"," Transcript/Student" info, "Labels", "Pages Scanned", "New Documents", "Indexed/Modified", and "Viewed/Printed" documents.

MAR	Request Cycle Time	Transcript /Student	Labels	Pages Scanned	New Documents	Indexed Modifed	Viewed/ Printed
Daniel	3.80	6	296	Ø	Ø	Ø	
DEBBIE	4.02	42	Ø	1,339	73	570	3,683
DENISE	8.51	9	Ø	2,572	230	130	12,677
Casey	15.88	Ø	Ø	1,417	218	18	1,749
Russ	4.66	2	Ø	9	2	246	4,001
Tammie	11.19	Ø	Ø	1,435	451	175	11,609

Request cycle time and activity volumes for transcripts, labels, pages scanned, new documents, indexing/ modifying records, and viewed/ printed documents.

And the last board tracked "Total Records Requested" by month with "Total Records" and "Percentage of Completion on Boxes", "% Complex Requests" and "% of Records in Digital Format."

FY 2?	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	March	April	May	June
Total Records Requested R	206	213	268	251	212	155	229	234	225			
Total Records Requested P	226	240	240	249	230	178	193	351	202			
Cycle Time Internal	7.09	5.89	4.88	4.12	4.35	6.98	4.77	5.31	7.10			
Public Record	9.12	9.08	8.00	7.68	11.13	9.40	14.06	16.50	15.88			
Transcript	2.86	2.75	2.82	2.08	2.93	1.08	1.63	1.19	.74			
Total Scanned	5,339	6,595	8,885	8,387	8,397	6,548	6,307	6,965	6,772			
% Dest complete boxes	0%	0%	1.13%	34.02%	47.99%	64.41%	71.40%	80.31%	84.47%			
	0	0	98	2859	1,215	1,427	608	799	337			
% Complex Requests	10.61	12.5	14.14	6.12	3.81	10.81	18.92	21.59	15.38			
% Records in Digital Format	37.17	36.88	37.44	40.01	4.53	43.92	45.55	46.60	47.07			
Forms Cycle Time (min)	1.0	19.96	5.88	18.00	38.33	29.75	12.00	42.00	48.84			

Total records requested, percentages of completion and percent of records in digital format.

We want to commend Document Management team for using these metrics to track/monitor the progress of the essential functions within their department.

The metrics reporting of scanned documents by month is noteworthy.

RESULTS & RECOMMENDATIONS:

Overall Conclusion:

Our overall conclusion is that Document Management is operating efficiently and effectively but there are areas that can be improved and/or streamlined to create better operational efficiencies and compliance. Our detailed findings and recommendations follow.

1) The district has no contract with the vendor that disposes of its public records. *(Moderate Risk)*

Best Practice:

Public records should be secured and protected until disposed of in accordance with statutory requirements and School Board Policies. A contract or agreement should set forth the vendor's performance requirements and the district's recourse should the vendor fail to meet those requirements.

Audit Result:

The district outsources records disposal / destruction. The vendor currently used is certified through the National Association of Information Destruction (NAID). NAID AAA Certification is a voluntary program for companies that provide information destruction services. It helps organizations verify that a potential shredding and destruction vendor meets the strict information disposal standards established by NAID. The district does not have a contract with this vendor. Although the NAID Certification is notable, the lack of a written agreement puts the district at risk if the vendor were to fail to protect records until they are destroyed or were to perform improper or incomplete disposal procedures.

The vendor picks up records, which are shrink-wrapped and placed on pallets. The vendor weighs the records and pays the district based on the weight. The records are removed from district facilities for disposal and the vendor returns a certificate of destruction to the district afterward.

Operations are effective but there are areas that can be improved.

The district has no contract with the vendor that disposes of public records.

Recommendation:
We recommend Document Management secure a contract with the vendor to include language describing the district's performance requirements for disposal of records in accordance with Florida Statutes and School Board Policies.

2) Limited guidance is provided to schools and departments on proper management of electronic public records information. *(Moderate Impact)*

Best Practice:
Every state agency is required to appoint an RMLO. The RMLO advises and oversees public records and ensures retention, storage and disposal processes are performed in accordance with State Statutes and guidelines. When performed effectively, the RMLO ensures 1) public records are handled securely, 2) public records are stored safely; 3) public records are retained according to state guidelines, and 4) public records are properly destroyed. These guidelines apply to all records, whether paper or electronic.

Audit Result:
The District's intranet website for records management provides guidance to schools and departments for various types of public records requests and describes the authority by which that guidance is given. However, it does not address how to properly maintain, safeguard and dispose of electronic public records.

Every department in the district organizes its electronic records in folders and subfolders the way they wish. File and folder labeling is not standardized, nor are naming conventions, indexing / referencing or archival / destruction requirements. This makes for a lot of inconsistency and hampers records searches, not to mention overall compliance with statutes and regulations.

Recommendation:
We recommend Document Management provide guidance on the proper procedures for the storage and disposal of electronic records on a district-wide level.

Further guidance is needed for the district regarding the proper storage and disposal of electronic records.

Every department organizes its records the way they wish. File and folder labeling, naming conventions, etc. are not standardized.

3) School Board Policy EH, Forms Approval Process *(Moderate Risk)*

Best Practice:
District directives are provided to mitigate risk and unwarranted exposure to the District. They also serve as a guideline for district employees to follow when there may be varied opinions about official district business. School Board Policy EH-Forms Management was designed for this purpose and should be followed or modified when the directive needs changing.

School Board Policy EH-Forms Management provides guidance to the district for forms that are commonly used by multiple departments within Orange County Public Schools. EH Forms Management, Section 4 - OCPS Forms Review Committee (a) – (c) thru Section 8 of this policy requires all requests for new forms be presented to the Forms Committee for review and approval before being prepared and published.

SOP RM_2 Official Form 1. c. ii. states "Forms management will forward the form(s) to OCPS' Legal department to ensure the form(s) are compliant with applicable laws/statutes."

Audit Result:
There is a gap between SB Policy EH and the district's handling of forms management. DM does not send the official forms request to Legal for review and sign off nor do they submit form(s) to the Forms Review Committee for review and approval per the District's EH-Forms Management guidance. Section 4 of this policy states that forms need to be vetted through this committee, which should be comprised of members selected from OCPS's administrative and instructional staff.

Recommendation:
We recommend Document Management either follow School Board Policy EH and SOP RM_2, or, revise the requirements in these documents if they are not appropriate.

School Board Policy EH governs forms management.

The policy calls for official forms to be reviewed and signed off by Legal Services. It also calls for a review by a Forms Review Committee.

Neither of these requirements are being performed.

Follow the policy or revise it if it is not applicable.

4) Public Records Storage and Disposal Tracking System *(Moderate Risk)*

Best Practice:
Inventory and records tracking systems must be maintained in real time or the information in them is not accurate or reliable.

Audit Results:
The database used to track records stored in the warehouse did not accurately reflect the status and location of two out of 10 records boxes we selected for observation. During our test of Document Management's record tracking methods, two boxes we selected were not where the tracking system said they would be, although they were found as explained below. Management stated one of the missing boxes was on a destruct list and had been destroyed. The second box had also been destroyed but its contents were scanned into the internal (electronic) storage system.

Recommendation:
We recommend Document Management update the database more frequently (we understand a real-time system is coming soon) and continue its periodic validation of the information in the tracking system by comparing it to what is actually in the warehouse.

5) Record Management applications outside of Document Management *(Moderate Risk)*

Best practice:
Among other duties, the RMLO must report the agency's compliance annually to the Division of Library and Information Services. The RMLO signs a statement each year that certifies OCPS complies with Florida Statutes 257.36-5, and Rule 1B-24.003(9), Florida Administrative Code for all public records regardless of medium or format (paper, electronic, email, microfilm, audio, video, etc.). The district should therefore ensure public records removed from its facilities are stored and destroyed according to those guidelines and should require vendor systems that house these records attest to such in a contract. This will protect the District from liability that may arise as a result.

Inventory tracking systems for records storage and retrieval should be continually updated and quality controls should be used to validate records are where they should be.

Other departments with "satellite" records management software should consult with the RMLO before new contracts are initiated to ensure they comply with State laws and regulations.

Audit Results:

The Senior Administrator, Document Management, has been designated as the district's RMLO. During our audit, we learned several departments use Record Management systems outside of the Document Management department. These "satellite" records systems operate without involvement or guidance from the RMLO regarding storage, retention, and destruction requirements. This creates problems responding to public records requests and makes it difficult for the RMLO to be confident of the accuracy of his annual certifications to the state. It also creates inefficiency through duplication of systems and can result in increased cost to the district.

We obtained information about these systems and the vendors' names, and obtained copies of the contracts. Most of the contracts have language that states they must follow Florida Statutes with regard to records management; one contract had no such language; and, two of the departments are still negotiating contracts.

Recommendation:

Document Management should be involved during the requirements definition phase for these systems and provide collaborative support in the evaluation of systems proposed to meet those requirements. At a minimum, requests for satellite records systems should be reviewed by the District RMLO in advance, allowing for input and insight to contract terms and performance expectations related to public records laws.

We wish to thank the Document Management staff for their cooperation and assistance with this audit.

Several departments maintain their own records systems.

Document Management should be involved in requirements definition for satellite records systems.

Department / School Name	Document Management
Administrator / Department Head	Les Vaughn
Cabinet Official / Area Superintendent	Roberto Pacheco

Audit Result / Recommendation	Management Response Acknowledgment/ Agreement of Condition	Responsible Person (Name & Title) And Target Completion Date	Management's Action Plan
1. The District outsources records disposal / destruction. The vendor currently used is certified through the National Association of Information Destruction (NAID). NAID AAA Certification is a voluntary program for companies that provide information destruction services. It helps organizations verify that a potential shredding and destruction vendor meets the strict information disposal standards established by NAID. The District does not have a contract with this vendor. Although the NAID Certification is notable, the lack of a written agreement puts the District at risk if the vendor were to fail to protect records until they are destroyed or were to perform improper or incomplete disposal procedures.	The Document Management Department has worked with several NAID AAA certified document destruction companies to securely destroy district records, having met their retention while also providing revenue from recycling the shredded material. The department reviewed various vendors to perform the duty that met the requirements and sought out the most revenue for rebate. Over the years, the recycling market has changed, and recycling revenue is no longer available to recycle destroyed paper records. The current vendor performs the service at no cost to the District.	Les Vaughn/David Wheeler 02/2023	The Document Management Department will work with Procurement to negotiate a contract with minimal or no cost to the District which includes language describing the District's performance requirements for the disposal of records in accordance with Florida Statutes and School Board Policies.

The vendor picks up records, which are shrink-wrapped and placed on pallets. The vendor weighs the records and pays the District based on the weight. The records are removed from district facilities for disposal and the vendor returns a certificate of destruction to the District afterward. Recommendation: We recommend Document Management secure a contract with the vendor to include language describing the District's performance requirements for disposal of records in accordance with Florida Statutes and School Board Policies.			
2. The District's intranet website for records management provides guidance to schools and departments for various types of public records requests and describes the authority by which that guidance is given. However, it does not address how to properly maintain, safeguard and dispose of electronic public records. Every department in the District organizes its electronic records in folders and subfolders the way they wish. File and folder labeling is not standardized,	As the definition for 'Public Records' does not differentiate between formats (paper, electronic, microfilm, etc.) and such requirements for storage and capture of each format may be different in the FL Admin Code, the site at the time of the audit contained the information outlined, however, it was not segregated. Since the finding was pointed out, the guidelines and recommendations were resolved by creating a separate page within the site for Electronic Recordkeeping.	Les Vaughn Completed 08/2022	Document Management has updated the website to provide guidance on the proper procedures for the storage and disposal of electronic records on a district-wide level.

nor are naming conventions, indexing / referencing or archival / destruction requirements. This makes for a lot of inconsistency and hampers records searches, not to mention overall compliance with statutes and regulations. Recommendation: We recommend Document Management provide guidance on the proper procedures for the storage and disposal of electronic records on a district-wide level.			
3. There is a gap between SB Policy EH and the District's handling of forms management. DM does not send the official forms request to Legal for review and sign off nor do they submit form(s) to the Forms Review Committee for review and approval per the District's EH-Forms Management guidance. Section 4 of this policy states that forms need to be vetted through this committee, which should be comprised of members selected from OCPS's administrative and instructional staff. Recommendation: We recommend Document Management either follow School Board Policy EH	The policy was originally written with the resources outlined in the original project charter. As the resources and scope has changed, the policy has not. The vast majority of forms are vetted through our legal department prior to submittal and an executive cabinet member signs off all forms. In addition, staff will conduct research on the topic, and submit findings related to policy or management directive to executive leadership.	Les Vaughn/Legal Counsel Office 07/2023	Staff will submit findings and implement items approved by executive leadership.

and SOP RM_2, or, revise the requirements in these documents if they are not appropriate.			
4. The database used to track records stored in the warehouse did not accurately reflect the status and location of two out of 10 records boxes we selected for observation. During our test of Document Management's record tracking methods, two boxes we selected were not where the tracking system said they would be, although they were found as explained below. Management stated one of the missing boxes was on a destruct list and had been destroyed. The second box had also been destroyed but its contents were scanned into the internal (electronic) storage system. Recommendation: We recommend Document Management update the database more frequently (we understand a real-time system is coming soon) and continue its periodic validation of the information in the tracking system by comparing it to what is actually in the warehouse.	The two boxes described were in fact in the building. One was in the quality control process after imaging, in the office location, and the other had met minimum retention, was on the annual destruction list, and was segregated for secure destruction. It should be noted that Document Management is in full compliance with State records guidelines and all boxes were secure. Each box is barcoded with a unique identifier, scanned multiple times through the handling process, and all data associated with each individual box is brought into the database utilizing an automated official district form for each work location to complete, verified by Records Staff and scanned into the Archive Center. Each entry contains details regarding records series, work location, inclusive dates, retention schedule, inventory date, staff performing each step, and barcode number.	Les Vaughn 07/2023	Document Management has already purchased and is currently testing a new SQL database to replace Access. The new system is integrated with our current Public Records Request database and will utilize new barcode readers that are Wi-Fi enabled. In addition, the new automation will add an enhanced level of data accuracy, software support, and streamlined efficiency.

5. The Senior Administrator, Document Management, has been designated as the District's RMLO. During our audit, we learned several departments use Record Management systems outside of the Document Management department. These "satellite" records systems operate without involvement or guidance from the RMLO regarding storage, retention, and destruction requirements. This creates problems responding to public records requests and makes it difficult for the RMLO to be confident of the accuracy of his annual certifications to the state. It also creates inefficiency through duplication of systems and can result in increased cost to the District.	Document Management will conduct research on the topic and submit findings related to policy or management directive to executive leadership.	Superintendent/Legal Counsel Office/Roberto Pacheco/Les Vaughn 07/2023	Staff will submit findings and implement items approved by executive leadership.
We obtained information about these systems and the vendors' names, and obtained copies of the contracts. Most of the contracts have language that states they must follow Florida Statutes with regard to records management; one contract had no such language; and, two of the departments are still negotiating contracts.			
Recommendation: Document Management should be involved during the requirements			

definition phase for these systems and provide collaborative support in the evaluation of systems proposed to meet those requirements. At a minimum, requests for satellite records systems should be reviewed by the District RMLO in advance, allowing for input and insight to contract terms and performance expectations related to public records laws.			