

Executive Summary

Audit Committee Meeting, December 15, 2020

THE OFFICE OF THE INTERNAL AUDITOR

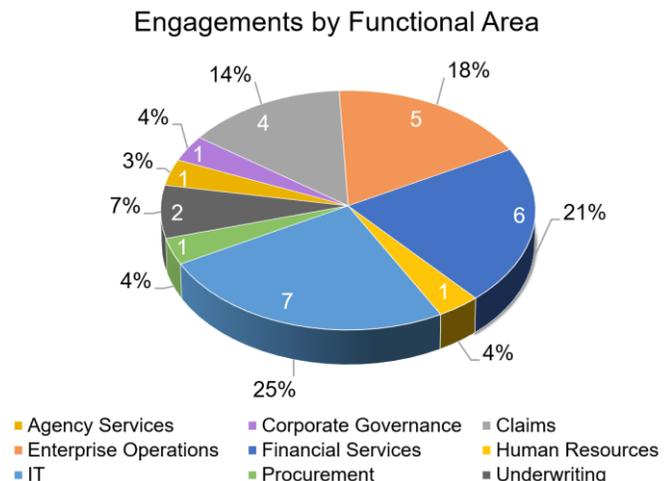
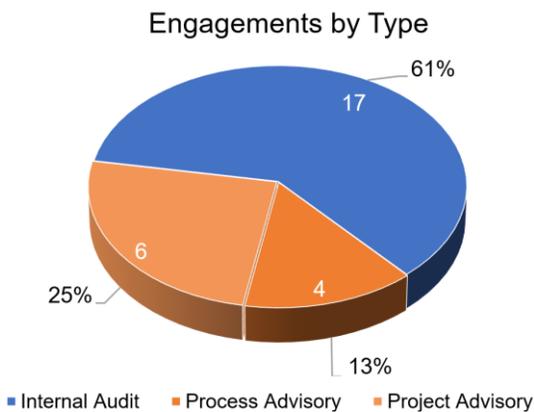
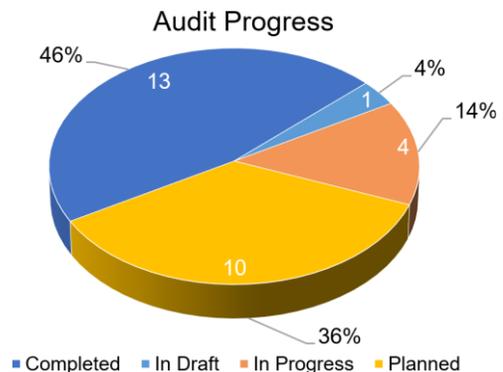
The Office of Internal Audit focuses its attention on areas where it can contribute the most by working with the organization to reduce risk, improve the control infrastructure and increase operational efficiencies. Since the last Audit Committee meeting, we focused on providing audit, risk management and internal control reviews to the corporation in alignment with our rolling plan.

Internal Audit

Overview of Audit Progress

Internal Audit (IA) follows a risk-based quarterly rolling plan approach in developing engagements and monitoring progress. As we review risks and consider operational challenges, we re-examine our plan and confirm that it continues to provide the expected assurance and that audit resources remain appropriately focused.

Internal Audit Plan (July 1, 2020 to June 30, 2021)	
Completed	13
In Draft	1
In Progress	4
Planned	10
Total Projects	28



Audit Engagements Completed

Following the last meeting we completed work on five audit engagements:

- **Centerpoint Role Redesign Implementation** - Past internal audits noted instances of inadequate segregation of duties and excessive access permissions that were not adequately

Executive Summary

Audit Committee Meeting, December 15, 2020

monitored. In response to these audit findings, Citizens contracted a vendor with extensive Oracle Fusion Cloud Applications experience to verify and validate the implementation and configuration of specific Centerpoint roles, recommend custom roles and assist in the design of the custom roles. Internal Audit tested the redesigned and new roles to provide reasonable assurance that the changes addressed the controls issues noted in the prior audits. We found that roles had been adjusted to align with segregation of duties or management reporting remains in place for appropriate monitoring.

- **Claims Payment Platform** - With this engagement, IA provided advisory services in support of the project through consultative advice related to controls of project management, as well as confirmed the effective and timely escalation and handling of project issues. The scope of work also included a review of user access and permissions developed during the project, as well as 3rd party vendor controls.
- **Identity and Access Management** - With this engagement, IA provided risk and controls advice as the multi-year project progresses. Overall, we noted that adequate processes are in place to support and ensure the effective completion of the project. The project governance structure is designed well, the project is on target in accordance with the timeline defined in the Implementation Roadmap, standard control processes were used in system implementations and a process enhancement related to change management for cloud services was provided to management for consideration.
- **OFAC (Office of Foreign Assets Control)** – IA evaluated current OFAC screening practices and procedures and to assess the effectiveness of the program against a framework for OFAC compliance published by the Department of Treasury. Results from our audit work indicated that Citizens procured and has access to an OFAC compliance software platform which is used to screen third parties against OFAC's most up-to-date and accurate SDN (Specially Designated Nationals) listings. When compared with recorded leading practices, published whitepapers and guidance provided by the framework for OFAC compliance published by the Department of Treasury, we assessed that there is an opportunity to improve and strengthen Citizens' current screening practices, governance, and control activities to ensure comprehensive OFAC screening is conducted going forward. Specifically, OIA identified an opportunity to expand current pre-screening (screening of 3rd parties before the transaction occurs) and ongoing/periodic screening of 3rd parties in Citizens. Additionally, OIA identified that there is an opportunity to provide an enhanced governance structure around OFAC compliance at Citizens by developing and maintaining a written OFAC Sanctions Compliance Program (SCP).
- **Third Party Risk Management** - Internal audit evaluated the design effectiveness of Citizens' third-party risk management process and found the process to be designed effectively to adequately manage third-party related risks. The third-party risk management activities and tools used to manage contracts and third parties, coupled with the key roles and responsibilities related to managing third-party providers, creates a robust process to provide effective risk management. Additionally, Internal Audit found the process to be mostly proactive with several optimized activities based on a maturity model used to measure Citizens. Finally, Internal Audit found that Citizens takes fourth-party risks into consideration and addresses these appropriately.

Detailed copies of audit reports are included in this presentation.

Executive Summary

Audit Committee Meeting, December 15, 2020

Work in Progress

There are five audit engagements in progress:

- **Centerpoint Configuration** Centerpoint (Oracle Fusion) replaced independent applications previously used by Human Resources, Finance and Procurement. Oracle module configuration is complex and proper configuration of the modules is necessary to adequately restrict and/or eliminate the ability to override controls in place to prevent inappropriate transactions. Improper application configuration may lead to unauthorized transactions that may impair business operations or allow nefarious transactions. IA will confirm that Centerpoint modules are properly configured to ensure that security is adequate and prevents the override of key controls, appropriate logging is enabled, and business operational process needs are met with configurations that are installed.
- **Contingent Workforce** Contingent workers are used to augment Citizens' regular employee workforce, provide services associated with tasks, business processes, or specialized activities that Citizens has elected to outsource and provide Citizens the flexibility to scale operations to meet fluctuating market needs. Contingent workers are independent contractors, consultants, or other outsourced and non-permanent workers who are hired to work under a contract for a specific period or project. IA will assess the contingent workforce program to ensure the program is effective, properly executed and managed.
- **Commercial Underwriting Compliance** There are various State of Florida Statutory underwriting requirements which Citizens needs to follow for properties to be eligible for coverage under specific product types. An example would be coverage eligibility for properties with transient public lodging. We plan to assess the adequacy and effectiveness of controls in place to meet State of Florida Statutory underwriting requirements.
- **Escheatment** Citizens is required by state laws and statutes to turn over unclaimed property to the states after a certain period, which varies by state. In this case, the unclaimed property refers to money due customers uncashed checks. IA will evaluate the adequacy of key business processes and control functions related to the escheatment process.
- **IT Security & Risk Incident Response Exercise** Internal Audit was asked to participate in the exercise and provide feedback regarding the attainment of exercise objectives. The scope includes a determination of: whether the process followed in the exercise met the intent of the ITSR Cyber-Security Incident Response Plan and Checklist; strengths and opportunities for improvement noted during the exercise; completeness of process documents; and the validity of IT observations and recommendations drawn from the exercise.

Executive Summary

Audit Committee Meeting, December 15, 2020

The OIA continues to provide regulatory support to the:

- Auditor General Audit** Internal Audit in its liaison role is responsible for coordinating with the State of Florida Auditor General auditors who are conducting their triennial operational audit commencing in September and is expected to be completed Q3 2021. Most of the coordination efforts constitute meeting planning, information request tracking and delivery, and overall ensuring the examiners/auditors receive the correct information timely.
- Market Conduct Examination** Internal Audit in its liaison role is responsible for coordinating with the Florida Office of Insurance Regulation (OIR) Market Conduct examiners who are completing their biennial exam and is expected to be completed by February 2021. As with the Auditor General audit, most of the coordination efforts constitute meeting planning, information request tracking and delivery, and overall ensuring the examiners/auditors receive the correct information timely.

Work Planned

The following audit engagements are scheduled to be completed during Q2 2021:

- Accounts Payable** With the recently implemented system enhancements in the financial module of Oracle's integrated ERP solution (Centerpoint), there is an opportunity for IA to evaluate the accounts payable process and related controls. Accounts payable has inherent risk associated with financial misstatement and potential for monetary loss through duplicate payments, unauthorized payments, and payments made on non-received goods or services.
- Application and Infrastructure Standards and Conformance** Applications or infrastructure components may not be configured in alignment with IT Security and / or hardening standards, potentially creating opportunities for unauthorized or undocumented access and downstream business disruption or security events to occur. IA will review elevated risk applications and infrastructure components against IT Security and hardening standards to validate compliance.
- Appraisal Process** A substantial portion of claims are being referred to appraisal to settle claims and are now a more central part of the claim's settlement process. IA will evaluate the adequacy and effectiveness of controls related to the Appraisal process.
- Claims Litigation File Review** The reduction in litigation volume and expenses may be a temporary event downturn due to Covid-19 and legal matters being put on hold through the court systems. Total legal spend is however projected to be close to \$100M for 2020, which is still a significant expense to the organization. IA will perform a detailed study of Citizens' Litigation Management process (including matter management) and compare to leading practices.
- Claims Litigation Management** Citizens relies on 100+ outside defense firms to provide claims-related legal defense counsel services. Citizens' ability to manage complex legal

Executive Summary

Audit Committee Meeting, December 15, 2020

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| System Implementation | bills submitted by contracted defense counsel representing Citizens in litigated matters continues to be an integral process in support of controlling costs and ensuring a strong financial operating environment. IA will participate in the project team and provide process, risk, and controls advice for the implementation of the Claims Litigation Management System. |
| <ul style="list-style-type: none"> • Cloud Migration Program | Migration to cloud services and solutions means reliance upon service providers for applications and infrastructure along with some support services. When migrating critical applications and infrastructure to the cloud, ineffective cloud implementation processes may lead to business disruption, unnecessary expenses and/or unauthorized access to confidential data. IT management requested that IA support this project in an advisory capacity. IA will provide insight related to risks and controls associated with migration of applications and infrastructure to cloud services. IA will also validate that governance processes appropriately support the project and perform new controls implementation testing where requested. |
| <ul style="list-style-type: none"> • Commissions | It was noted during an IA review that Citizens has paid commissions on uncollected premiums resulting from the cancellation/nonrenewal moratorium. Commissions are due back to Citizens for policies where the premiums were not collected. IA will evaluate whether controls associated with commission rates and calculations are effective and ensure that commissions paid to agents are accurate, authorized, and timely. |
| <ul style="list-style-type: none"> • Identity and Access Management | Citizens' IT Security and Risk department is in the process of implementing an enterprise wide strategy to consolidate and centralize user identity and access management processes and technology capabilities. Complexity will continue to increase as new cloud solutions, systems and applications are adopted and integrated into the current environment. These complexities should be understood and appropriate controls for authentication and authorization should be implemented to mitigate risks associated with user access/privileged access, segregation of duties, oversight and monitoring and reporting capabilities. IA will assess project governance and progress during the multi-year implementation of a comprehensive identity and access management solution and corresponding processes and provide advice throughout the project as needed. |
| <ul style="list-style-type: none"> • Logging and Monitoring | System and application logging is required to provide an audit trail of business and system transactions to monitor access and correlate events that may require additional research and follow-up. Absent appropriate logging practices being implemented, there is a risk for lack of accountability for system changes and potentially an inability to surface information to detect or reconstruct system events and/or possible threats when required. We will assess the implementation of system and |

Executive Summary

Audit Committee Meeting, December 15, 2020

application logging and monitoring to ensure that operational and security risks have been identified, corresponding logging practices have been implemented and appropriate event monitoring is occurring. We will also validate that logging fully supports the incident response process.

- **Underwriting Staffing Analysis** IA was requested to participate in Enterprise Operations analysis of current underwriting staffing models and provide advice and project support where appropriate.

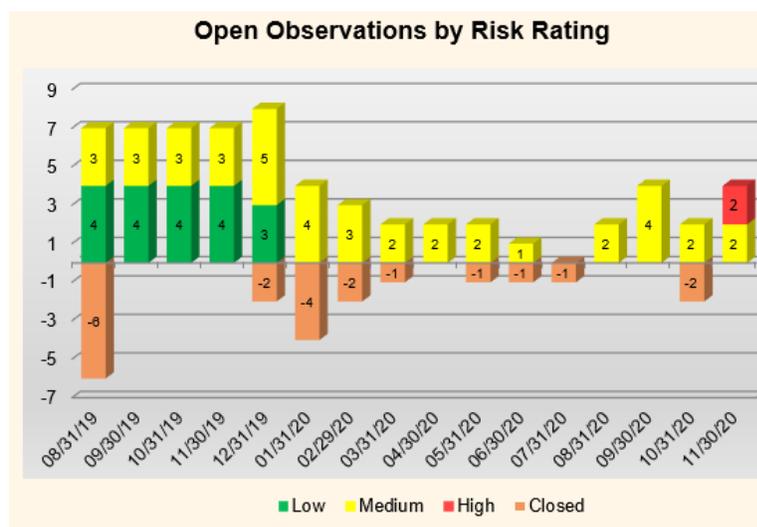
Resources

Internal Audit is currently recruiting to fill a vacancy for an Internal Auditor Manager.

Control Deficiency Resolution

Internal Audit (IA) maintains a database containing reported audit observations, recommendations, management action plans and target completion dates originating from IA audits, reviews performed by the external auditors and regulatory exams conducted by the Office of Insurance Regulation and the Auditor General. Open items receive priority focus from management and are generally addressed within an agreed period. We are currently tracking 4 open observations of which 2 are rated as high impact. Both high rated open items relate to the recent OFAC (Office of Foreign Assets Control) completed by Internal Audit and focus mainly on developing a formal OFAC Sanctions Compliance Program and tightening the OFAC screening practices at Citizens.

The chart below provides information on the number of current open observations over a period including the observation ratings, source of observation and year reported.



Observations by Year Reported		
2019	2020	TOTAL
0	4	4

Observation Source	
IA	4
External Auditor	0
Market Conduct - OIR	0
Auditor General	0
Total	4

Internal Control

The Internal Controls team (IC) is responsible for maintaining and monitoring Citizens' Internal Control Framework. A key component of the framework is the annual control self-assessments performed by management to validate the effectiveness of primary controls. In Q4, IC coordinated,

Executive Summary

Audit Committee Meeting, December 15, 2020

monitored, and provided guidance to Control Champions and management in the completion of the annual control self-assessments.

During 2020, 131 primary controls were identified and recorded across 71 business processes:

- The number of primary controls slightly increased from 128 as previously reported to 131 as additional controls were identified in IC quality reviews and operational risk assessments.
- Management control self-assessments will be performed for 110 primary controls. Some business areas have already completed their control self-assessments and the remaining areas are on track for completion by year-end.
- The remaining 21 primary controls are excluded from management control self-assessments as IC is scheduled to perform a refresh of these processes.

The IC team and Control Champions from the business areas collaborate to ensure that the control assessments continue to add value, improve processes, and strengthen Citizens' internal control environment. The 2020 aggregate control assessment results will be reported in Q1.

Enterprise Risk

Enterprise Risk (ER) facilitates, enables, and partners with business areas to deliver forward-looking and insightful risk perspectives that enhance the decision-making process and strategic performance of Citizens. The framework provides a consistent approach across the organization in the identification, assessment, and mitigation of strategic, operational, project and emerging risks.

Strategic Risk Management

Annually ER facilitates a strategic risk assessment with the Executive Leadership Team (ELT). The objective of the strategic risk assessment is to identify risks that may adversely impact Citizens' ability to achieve strategic objectives and key strategic initiatives over the next 12-18 months.

The strategic risk assessment is preceded by individual risk discussions with each member of the ELT. The individual discussions are scheduled to begin in December followed by the 2021 strategic risk assessment in January. In Q1, ER will work with the risk owners to develop and/or update mitigation plans where appropriate.

Mitigation plans continue to be monitored and executed as necessary for the 18 strategic risks that were identified in 2020.

Operational Risk Management

ER facilitates interactive operational risk assessments to enable Risk Champions and management to self-identify and assess risks that may impact the ability to achieve business objectives and to determine the effectiveness of mitigating activities to reduce risks. As of the end of November, a total of 381 operational risks have been identified and assessed across the organization. Risks are periodically updated through ER facilitated sessions and input from Risk Champions. The total number of operational risks fluctuate as risks are added, removed, and consolidated.

Executive Summary

Audit Committee Meeting, December 15, 2020

Status of the 2020 Operational Risk Assessments:

- 35% (27) of the operational risk assessments have recently been updated. There are no operational residual risks with a high-risk rating.
- 12% (9) of the operational risk assessments are currently being updated.
- The remaining risk assessments are planned for updates beginning in January. ER is collaborating with OIA Forensics and SIU to align and design the approach to incorporate the identification and assessment of fraud risks in the 2021 operational risk assessments.



Scenario Risk Assessments

Upon request, ER facilitates scenario risk assessments to evaluate emerging risks and to discuss mitigation plans that should be considered and/or developed to enhance the ability of the organization to proactively mitigate these risks in the event the scenario materializes.

In Q4, ER partnered with various business areas to focus on scenario risk assessments related to the potential for policy growth because of changing market conditions:

- *Commercial Lines Underwriting (CL UW) Scalability:* In September, ER facilitated a scenario risk assessment to identify and assess risks that may impact the department's ability to respond to market conditions resulting in increased volumes and to ensure that comprehensive mitigation plans are ready to be executed when needed. The assessment leveraged the CL UW scalability report, model, and key action steps for in-house resources. Internal Controls provided consultative advice regarding additional controls to consider in the future.
- *Market Conditions and Policy Growth:* ER is partnering with a subset of the Strategic Evaluation Group (SEG) to provide a cross-functional identification and assessment of key risks that may impact Citizens' operations as a result of market changes and the uncertainty related to the timing and quantity of policy fluctuations, as well as provide insights and recommended actions for planning and addressing any future impacts across the organization as necessary. The risk assessment kick-off session was held in November. The risk assessment sessions are anticipated to continue through Q1.

Action Item - GRC SOFTWARE SERVICES

The GRC system will integrate the management and administration of the Office of Internal Audit's (OIA) three complementary assurance functions, namely Internal Audit; Enterprise Risk Management; and Internal Control Monitoring.

Currently, IA uses TeamMate + provided by Wolters Kluwer Financial Services, Inc. TeamMate was procured in 2015 and will reach the end of its original 5-year term at the end of 2020. ER uses Resolver Inc.'s Risk Management Software. Resolver Risk was procured during 2017 and IC uses a combination of Word/Excel/Visio to maintain the Internal Control Framework, which has proven to be inefficient and time-consuming.

Executive Summary

Audit Committee Meeting, December 15, 2020

On May 21, 2020, Citizens issued Invitation to Negotiate (ITN) No. 20-0018 for the procurement of an integrated GRC system. On October 7, 2020, following negotiations and receipt of Best and Final Offers, the Citizens negotiation team recommended an award to AuditBoard, Inc. as the primary vendor, and to MetricStream, Inc. as a contingent vendor if the contract with AuditBoard cannot be finalized.

This new contract will provide a single integrated source for internal audit, enterprise risk and internal control as opposed to the segregated tools we use now. The single integrated tool will house all three applications and will provide compatible workflows, advanced reporting, self-service, and ease of use.

The AuditBoard contract will have a five (5) year base term and four (4) one (1) year optional renewal terms. The contract amount of \$1,700,000 consists of the following:

- \$87,000 for Implementation Services (one-time fee);
- \$763,100 for Base Term Subscription Fee (\$152,620 per year);
- \$671,528 for Renewal Term Subscription Fees (\$167,882 per year); and
- \$178,378,372 in Contingency Funds, including additional costs if usage exceeds current estimates as follows:
 - SoxHub Module (includes 250 tested controls; additional cost will be \$2500 per year for 50 additional controls);
 - OpsAudit (includes 50 Audits; additional cost will be \$5500 per year for 10 additional audits); and
 - RiskOversight (includes 1,000 Risks; additional cost will be \$5000 per year for 100 additional risks).

The authorized contract amount of \$1,700,000 may be transferred to the contingent contract with MetricStream, if necessary, with the understanding that the amount spent on the two contracts will not exceed \$1,700,000 over the nine-year authorized term.

Recommendation

Staff recommends that the Citizens Board of Governors:

- a) Approve the recommendation of a contracts to AuditBoard, Inc. as the primary vendor for a GRC Software Solution, at an amount not to exceed \$1,700,000 over a 5-year base term and four 1-year optional renewal terms, and to MetricStream, Inc. as a contingent vendor, as set forth in the Action Item; and
- b) Authorize staff to take appropriate or necessary action consistent with this Action Item.

Action Item - 2020 OIA Strategy & Plan and 2021 OIA Budget

2020 OIA Strategy & Plan

The OIA presents, for review and approval, its 2021 Strategy and Plan (Plan). The Plan was developed using a risk-based approach to understand and assess Citizens' operations and associated risks. Additional consideration was given for future work to be conducted by the Auditor General, Market Conduct Examinations, and planned strategic initiatives.

Executive Summary

Audit Committee Meeting, December 15, 2020

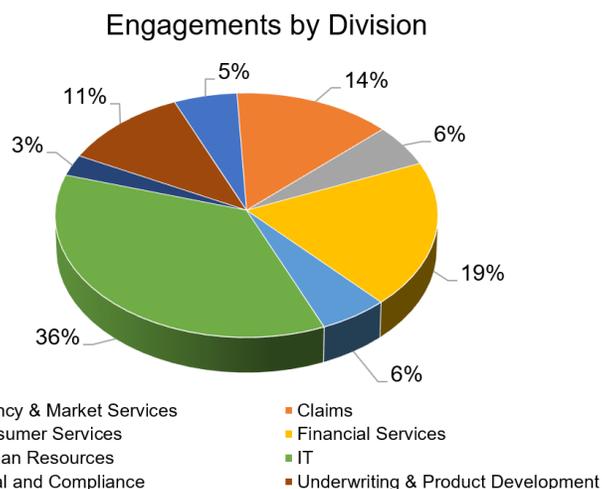
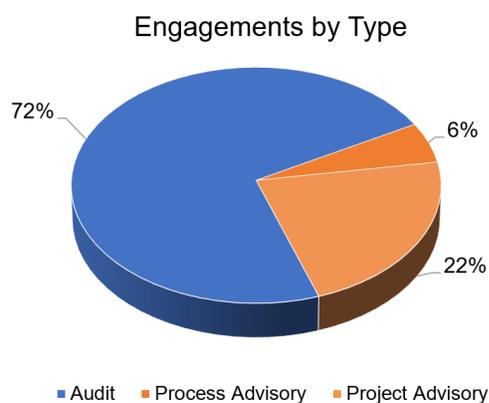
The objective of this plan is to provide the most timely and comprehensive scope of audit, risk, and control coverage by using resources available to the OIA. Since it is impractical to provide risk and control coverage to the entire corporation on an annual basis, we collaborated with business unit leadership to determine the best focus areas for Internal Audit, Enterprise Risk and Internal Control given current circumstances.

Internal Audit

IA follows a detailed annual planning process and prepares a themes-based audit plan which considers the possibility of dynamic risk fluctuations and process changes throughout the year. This necessitates regular re-evaluation of audit approach and scope so that appropriate audit focus is always given to important strategic and operational issues and risks. Throughout the year, the audit plan continuously evolves to support our dynamic risk environment, focusing on current and emerging reputational, compliance, operational, information technology and financial risks. To achieve the greatest impact, IA “rebalances” internal audit activities in a rolling audit plan to ensure adequate focus is given to Citizens’ strategic issues and critical processes.

IA documented seven (7) specific audit themes which consolidate and provide high-level insights into the years’ audit focus areas. As the year progresses IA will use its quarterly rolling risk assessment process to identify engagements to be selected for every reporting period.

In identifying the types of audit engagements IA invited management requests for consultative support and ensures that there is a healthy balance between assurance (audit) engagements and consulting (advisory) engagements. This plan includes 72% audit and 28% advisory type engagements. We also focus on every division within the organization and ensures that there is a healthy coverage throughout Citizens as a whole.



Enterprise Risk

For 2021 ER will continue to facilitate and enable risk assessments from five different perspectives, namely: strategic, operational, fraud, project and scenario.

- Strategic risk - ER will facilitate a strategic risk workshop with the ELT to identify and assess the 2021 strategic risks. Comprehensive mitigation plans will be documented and executed, as necessary.

Executive Summary

Audit Committee Meeting, December 15, 2020

- Operational risk - ER facilitates interactive operational risk assessments that enable Risk Champions and management to self-identify and assess risks that may impact the ability to achieve business objectives. Risks are updated periodically as needed.
- Fraud risk - ER will include fraud risk discussions in the facilitated operational risk assessments as a tool for management to identify and assess risks to businesses processes that may present potential fraud risks to the organization. ER will collaborate with the OIA Forensics Team and SIU on this initiative.
- Project & scenario risk - Upon request, ER provides facilitation services and consultative support through project and scenario risk assessments. The risk assessment discussions assist management in identifying risks that should be closely monitored and additional controls that should be considered or implemented.

In support of the abovementioned risk assessments, ER will, as part of the OIA GRC procurement, implement an enterprise risk management system solution that will: provide scalability, efficiency, and a holistic view for the several types of risk assessments; enable risk champions and management to self-identify, evaluate, record, and manage risks; and enhance ER's ability to provide management with real-time risk reporting capabilities.

Internal Control

In 2021, IC will continue to ensure consistency and sustainability of ICF throughout the organization while expanding consultative services to include advice on anti-fraud controls. IC will specifically focus on:

- Annual Control Self-Assessments - Control self-assessments (CSAs) are performed annually by management to validate the effectiveness of primary controls.
- Process Narratives - The narratives document the business objectives, process flows, key systems, and primary and mitigating controls. Management periodically updates the narratives and flowcharts to reflect any changes in processes, technology, and controls.
- Quality Reviews - Quality reviews are performed by IC to ensure that business areas with primary controls adhere to Citizens' ICF standards when performing the CSAs. The quality reviews are performed on a recurring 3-year cycle consisting of annual reviews of approximately one third (1/3) of the processes with primary controls.
- Anti-Fraud Controls - As the operational risk assessments are expanded to include fraud risks, IC will collaborate with ER, OIA Forensics, and SIU to provide consultative advice to the business areas regarding leading practices on internal controls to prevent and detect fraud.

In support of the abovementioned initiatives IC will, also as part of the OIA GRC procurement, implement an internal controls management system solution that will provide a centralized repository for ICF process narratives and flowcharts and also leverage control information across the solution to deliver a more efficient alignment of controls to risks.

2020 OIA Budget

The 2021 budget for Citizens' OIA presented is \$3.33 million as compared to \$3.06 million budgeted for 2020. As we continue to develop our staff and hire more business qualified individuals we improve upon the type and quality of audits we complete, which has a direct impact upon cost:

Executive Summary

Audit Committee Meeting, December 15, 2020

Office of Internal Audit	2020 YE Projection	2020 Budget	2020 Budget vs. 2020 YE Projection		2021 Budget	2021 Budget vs. 2020 YE Projection		2021 Budget vs. 2020 Budget	
	YearTotal	YearTotal	Favorable / (Unfavorable)		YearTotal	Favorable / (Unfavorable)		Favorable / (Unfavorable)	
Salaries & Benefits	2,302,888	2,491,041	188,153	8%	2,637,122	334,234	15%	146,081	6%
Contingent Staffing	119,100	7,200	-111,900	-1554%	102,000	-17,100	-14%	94,800	1317%
Training	23,007	35,600	12,593	35%	36,800	13,793	60%	1,200	3%
Operating Expenses	15858	17865	2007	11%	20,880	5,022	32%	3015	17%
Legal Fees	48,064	0	-48,064	-100%	50,000	1,936	4%	50,000	100%
Travel	5,882	43,315	37,433	86%	22,630	16,748	285%	-20,685	-48%
Professional Services	75,000	230,000	155,000	67%	259,000	184,000	245%	29,000	13%
Software Maintenance and Licensing	88,907	233,728	144,821	62%	197,000	108,093	122%	-36,728	-16%
Total Admin Expenses	2,678,706	3,058,749	73,126	2%	3,325,432	646,726	24%	266,683	9%
FTE	15	16	1	6%	16	1	7%	0	0%

- *Staffing* will remain static for Internal Audit (12), Enterprise Risk (2) and Internal Controls (2). For 2020 IA did not fill the Sr. Data Analyst role and was supported by contingent staff. We plan to fill this vacancy in 2021.
- *Salaries & benefits* growth indicates filling current IA vacancies during the first half of the year.
- *Training* is based on a dollar allocation per staff member to upkeep professional CPE requirements and develop professionally. During 2021 additional training will be necessary following the rollout of the newly acquired GRC system solution.
- *Operating expenses* reflect a small variance in operating expenses due to a reduction in anticipated travel during 2021.
- *Legal Services* is traditionally a placeholder should the department need to use external legal services.
- *Professional Services & Contingent staffing* reflects an amount towards further development of the OIA's data analysis capability, GRC system implementation cost and anticipated internal audit consulting services.
- *Software Maintenance and Licensing* reflects licensing fees for the newly acquired GRC system.

Recommendation

Staff recommends that the Citizens Audit Committee:

1. Approve the 2021 OIA Strategy and Plan, and
2. Approve the 2021 OIA Budget as presented.