



Office of the Internal Auditor



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MEMORANDUM

Date: May 17, 2016

To: Jay Adams, Chief – Claims

CC: See Distribution

From: Karen Wittlinger, Director, Internal Audit

Subject: Check Processing Media Process Review

Background

Claims Management requested OIA to review the process associated with the receipt and retention of CDs, DVDs and other media devices from policyholders containing pictures or videos of property damage to validate appropriate controls have been applied. With the implementation of the Guidewire Claims Center module, files in video formats and other media files larger than 50mb in size are not able to be uploaded due to system configurations and the inability to directly access the Alfresco document repository system. The previously used system, ImageRight, allowed direct user access and was therefore able to accept photo and video files with no known limitations affecting operations. A work-around process was created in the Check Processing Unit to provide appropriate controls and storage for the media devices until Claims Center or Alfresco are able to accept these files.

Results

OIA reviewed the process documents maintained by the Check Processing Unit and discussed process details with the Claims Support Manager and Claims Support Supervisor. Overall, the process was found to be well defined and controlled. Significant effort has been extended by Claims Support Management to ensure the security of the media devices. Additionally, a ticket (i.e., user story) has been submitted by Claims Management requesting that IT research opportunities for a more automated approach. A few minor process improvements were noted for consideration by Claims Management to strengthen compliance to the Information Classification and Handling Policy and standard internal controls practices including:

- Review and approval of the Claims Support Media Receipts Workflow document annually to ensure that the data classification associated with information contained on the media devices has not changed in the Information Classification and Handling Policy. If the data classification changes, additional controls may need to be implemented to secure the data in line with the policy. Management should also include a cover page with the document denoting management approval and effective/review dates.

- Notification by Tampa Mail Services to Jacksonville Check Processing when sending media via inter-office mail received in Tampa. Claims file information is considered “Sensitive” according to the Information Classification and Handling Policy and requires advance notification to recipients when sending data to ensure control from acceptance to destruction or return of information. The notification can include the total number of items being mailed per day and does not require individual notifications.
- Validation with Legal Services regarding the retention period of the media devices to correspond with the claims file retention period in accordance with the Records Retention Policy. This retention period may be added to the Claims Support Media Receipts Workflow document as part of operational procedures.
- Addition of “Restricted” labels to media received containing medical-related pictures or videos. Although the pictures or videos are not considered as medical treatment information in the Restricted Information category by policy, it would be prudent to label the media as such from a best practices perspective. As well, a sign should be added to the file cabinet containing the media devices noting that there may be Restricted or Sensitive Information contained in the cabinet and as such, should remain locked when not in use.

We would like to thank Claims Management for the opportunity to assist in this advisory work and their consideration of these process improvements.

Distribution:

Greg Rowe, Assistant Director, Claims
Pauline Fields, Manager, Claims Support