

Office of the Internal Auditor

AUDIT REPORT



November 2022

Quality Monitoring
Targeted Audit



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Executive Summary

Background

The Citizens' Quality Improvement team uses the Virtual Observer system to monitor and assess employee calls for quality assurance and provide either employee performance or process-related feedback to business unit leadership to improve performance. However, a recent issue was identified where personal and sensitive data could be captured as part of the quality monitoring and recording process, creating a potential privacy concern for employees who handle inbound and outbound calls on behalf of Citizens.

A cross-functional workgroup was formed to review current quality monitoring practices and technologies for Citizens and federal and state statutes related to privacy. A Call Recording and Monitoring strategy were developed to mitigate the privacy risks.

Objectives and Scope

The objective of the audit was to evaluate the adequacy and effectiveness of the processes, procedures, and controls in place to mitigate the privacy risks related to quality monitoring and recording of personal information in the Virtual Observer system to ensure compliance with state and federal statutes. Our scope included a review of the following areas:

- IT Login Banner
- Employee Training
- Policies and Procedures
- Consent and Acknowledgement Forms
- Virtual Observer Provisioning and Deprovisioning Process
- Virtual Observer Quarterly User Access Review & Attestation

Results

Our work indicated that critical controls and processes related to the quality monitoring and recording of personal/sensitive information in the Virtual Observer system are adequate to ensure compliance with state and federal statutes and internal policies and procedures.

Specially we observed the following:

- IT Network Login and VPN Banners have been updated to include a no expectation of privacy clause, which informs users that Citizens reserves the right to monitor or record all employee activity using Citizens IT Resources.
- Training was developed to educate employees on protecting personal and private information, the types of monitoring conducted at Citizens (Quality and IT & Privacy Monitoring) when monitoring takes place, acceptable uses, and best practices.
- Employees were required to sign a consent form to give Citizens management permission to monitor business phone calls and voicemails for quality assurance and training purposes.
- Policies and procedures have been implemented to guide staff and outline best practices for using the Virtual Observer application.



Executive Summary

Through collaborative discussions, Internal Audit and management self-identified the following opportunity to improve the quality monitoring process:

- **Consider replacing the paper versions of consent and attestation forms with electronic forms.** These forms could be incorporated into the training course in the Learning Management System for the employees to sign electronically annually. The electronic documents would then be maintained under a single system of record. Employees must sign a paper version of the Consent to Monitor and Record Telephone Call and Screen Activity Form and the Virtual Observer Administration Standard Operating Procedure attestation form. The respective business unit manager maintains both forms in a separate file. Management will work with Learning and Development to update the mandatory training to include the electronic consent and attestation forms in Q1 2023.

We want to thank management and staff for their cooperation and professional courtesy throughout this audit.



Distribution

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The Honorable Ashley Moody, Attorney General
The Honorable Nikki Fried, Commissioner of Agriculture
The Honorable Wilton Simpson, President of the Senate
The Honorable Chris Sprowls, Speaker of the House of Representatives

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