

# Office of the Internal Auditor

# Engagement Report

January 2026

Citizens Business Insurance Suite  
Segregation of Duties

2025-IA-23



This report is a redacted version of a Restricted Confidential audit report. Certain information has been removed or summarized to comply with confidentiality and exemption requirements under Florida Statutes s.627.352.

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## Executive Summary

### Background

In 2025, Citizens transitioned its Guidewire solution, Citizens Insurance Suite (CIS), from an in-house setup to a cloud-based software-as-a-service (SaaS) model, Citizens Business Insurance Suite (CBIS). This included key modules such as ClaimCenter, PolicyCenter, BillingCenter, and ContactManager. The move to software-as-a-service (SaaS) introduces new risks and control considerations that this review will help assess. User access privileges were mostly left unchanged from the old to the new solution.

Segregation of Duties (SOD) is a foundational internal control principle that ensures no single individual has the authority to execute two or more conflicting responsibilities. In functional controls, SOD helps prevent fraud and errors by dividing tasks such as initiation, approval, and execution among different individuals. In IT General Controls (ITGC), SOD supports system integrity by separating duties like development, operations, and access management.

### Objectives and Scope

This review focused on how user access is managed in Guidewire, the system used to handle claims, policies, billing, and customer information. OIA determined whether any users or roles have access that could lead to conflicts in responsibilities (known as segregation of duties issues) or overly powerful access that could facilitate inappropriate access. The review considered segregation of duties within each center (ClaimCenter, BillingCenter, PolicyCenter), the cross-center contact management module (ContactManager) and across the entire Guidewire suite.

Internal Audit noted that the insurance industry has historically permitted segregation-of-duties conflicts within core processes. Such as agents writing and binding policies or adjusters adjudicating and approving claims. These practices are deeply embedded in operational workflows and are not inherently restricted by Guidewire.

### Results

Citizens has established high-level rules around SOD and least privilege. Access roles are defined for CBIS and its centers. Management self-reported three items regarding SOD that require attention.

### Conclusion

Internal Audit observed continued progress in the maturity of user access management following the transition to the CBIS SaaS environment. The implementation of MyIdentity now supports most access administration activities, representing a meaningful step toward more consistent and reliable provisioning processes.

The review identified opportunities to further strengthen governance around segregation of duties and least-privilege access.

Management has acknowledged these observations and agreed that additional analysis is appropriate. A small working group will be established to evaluate the identified items, consider existing compensating controls, and balance operational needs with risk management expectations. Upon completion of this analysis, management will develop an implementation approach and, where applicable, document risk acceptance decisions.

We would like to thank management and staff for their cooperation and professional courtesy throughout this engagement.

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This report is a redacted version of a Restricted Confidential audit report. Certain information has been removed or summarized to comply with confidentiality and exemption requirements under Florida Statutes s.627.3522025-IA-23 CBIS SOD.