

INTERNAL AUDIT

Data Retention
Advisory Engagement

September 7, 2018





Advisory Memorandum

Background

Data retention (also known as records retention) refers to the continued storage of Citizen's data (records) for compliance or business reasons. The process of data retention ensures that records are kept as long as legally and operationally required and that obsolete records are disposed of in a systematic and secured manner.

Citizens uses the General Records Schedule GS1-SL issued by the Florida Department of State, as a guide to identify minimum retention periods for the most common administrative records. Retention periods in the schedule are based upon federal and state laws and regulations, general administrative practices and fiscal management principles and Citizens may choose to retain records longer due to operational practices or for legal purposes. Maintaining records for an indefinite period can present risks such as additional storage costs, lost time searching for documents, and legal or security risks associated with over-retained documents.

Business unit administrative and/or operational records are documented with retention periods aligned with the GS1-SL in manual inventories by business unit designees. Training of designees and periodic updates to the inventories are facilitated by the Records Management Department within Legal Services.

However, there is not an established protocol for determining retention periods for maintenance of structured and unstructured data associated with IT application software. As a result, application and database data is maintained well beyond the requirements and not considered as part of the risk mitigation strategy. Management requested assistance from OIA to provide guidance in creating a formal structure that provides adherence to regulatory compliance, supports business operations and applies cost savings through data storage reduction.

Objectives and Scope

The objective of this engagement was to provide advice and guidance relative to implementation of a formal governance process and program components related to structured and unstructured application and database data. The scope of work included documenting an iterative process to support the development and maintenance of a retention schedule for structured and unstructured data, assessing the Enterprise Data Management (EDM) work group charter for potential enhancements, and providing program recommendations so that electronic data retention better serves the needs of the organization.

Results

OIA provided the advisory results to IT management, which included the following deliverables:

- An iterative work flow diagram depicting an outlay of the data retention process was developed and includes determination of application/database data retention schedules as



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well as data deletion in accordance with the schedules. Business and data owners, Records Management, the Enterprise Data Management group and other appropriate technical IT groups' responsibilities have been highlighted in the diagram. This work flow will be utilized to create a more detailed procedures document for implementation. (*Reference Appendix 1 for work flow diagram.*)

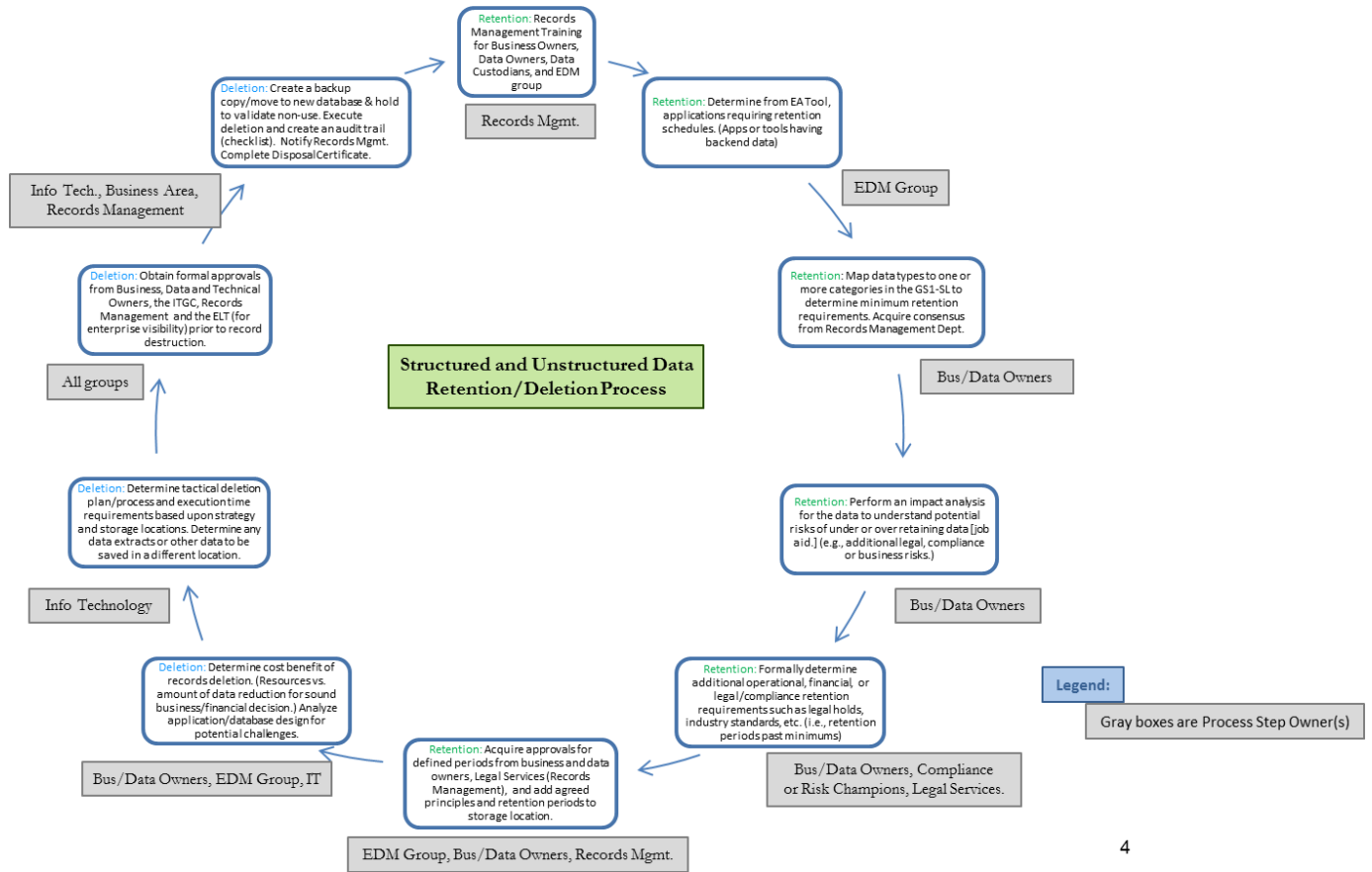
- An impact analysis was drafted for the Enterprise Architecture group and Records Management to utilize and enhance as the data retention process is refined.
- Suggestions focused on improving the Enterprise Data Management group charter were proposed, as the document is currently being revised by Enterprise Architecture to better serve the needs of the EDM group.
- Program recommendations were provided to IT Management and Records Management to support the data retention process work flow as follows:
 - Collaboration should continue between the Records Management and Enterprise Architecture departments to refine the application/database retention and deletion processes and comply with the corporate Records Management and Records Request Policy;
 - A secured folder should be created to store and share artifacts as the process is applied to each application and project work occurs. Certain application retention information discussed with management should be consistently maintained;
 - Data deletions should be approved by the business, data and technical owners, the IT Governance Committee, Records Management (per existing policy) and the Executive Leadership Team to ensure appropriate awareness and risk reduction across the enterprise;
 - A process step or checklist item should be added to the Systems Development Life Cycle to incorporate data retention requirements as major enhancements or new systems are implemented to avoid gaps in managing data in accordance with agreed schedules;
 - The EDM group charter should be reapproved and socialized periodically as turnover occurs or group objectives evolve. The Executive Leadership Team should be the approving Committee for the charter in order to delegate authority.

We request that management consider the materials provided in preparation of a comprehensive retention and deletion process for application and database data that addresses management's concerns and objectives, provides the ability to meet regulatory guidance and reduces data storage costs for the organization.

OIA would like to thank management and staff for their cooperation and professional courtesy throughout the project.



Appendix 1





Appendix 2

Addressee(s) Robert Sellers, V.P., Chief Technology Officer

Addressee(s) **Business Leaders:**
Barry Gilway, President/CEO/Executive Director
Kelly Booten, Chief, Systems and Operations
Christine Turner Ashburn, Chief, Communications, Legislative & External Affairs
Dan Sumner, Chief, Legal Services and General Counsel
Mark Casteel, V.P., Assistant General Counsel
Aditya Gavvala, V.P., IT Services and Delivery
Mark Kagy, Acting Inspector General
Chris Jobczynski, Director, Enterprise Architecture and IT Strategy
Michael Maitland, Manager, Records Custodian

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The Honorable Adam Putnam, Commissioner of Agriculture
The Honorable Joe Negron, President of the Senate
The Honorable Richard Corcoran, Speaker of the House of Representatives

The External Auditor

*Completed by Karen Wittlinger, IT Audit Director
Under the Direction of Joe Martins, Chief of Internal Audit*