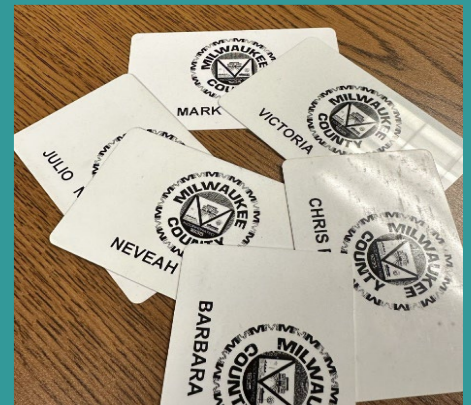# MILWAUKEE COUNTY OFFICE OF THE COMPTROLLER
Liz Sumner, Comptroller

MILWAUKEE COUNTY AUDIT SERVICES DIVISION

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Courthouse Access Keycards:
Controls Needed to Ensure Keycards are Deactivated When Users Terminate

August 2024

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To the Honorable Chairwoman
  of the Board of Supervisors
    of the County of Milwaukee

August 14, 2024

We have completed an audit, *Courthouse Access Keycards: Controls Needed to Ensure Keycards are Deactivated when Users Terminate.* While we found that Department of Administrative Services Facilities Management Division (Facilities) had both an Administrative Manual of Operating Procedure and written internal procedures on the keycard process, those procedures were heavily focused on the issuance of keycards. We found a lack of procedures and monitoring related to the appropriate termination of keycards.

Facilities is in the process of replacing the long-term keycard system that is currently in place, but our recommendations should continue as they will enhance any system that Facilities selects for its keycard system.

A response from Facilities is also enclosed. We appreciate the cooperation extended by Facilities and staff. Please refer this report to the Committee on Audit.

Jennifer L. Folliard
Director of Audits

JLF/mrp

cc: Liz Sumner, Milwaukee County Comptroller
      David Crowley, Milwaukee County Executive
      Milwaukee County Board of Supervisors
      Aaron Hertzberg, Director, Department of Administrative Services
      Stuart Carron, Director, Facilities Management Division
      Joe Lamers, Director, Performance, Strategy and Budget
      Denita Ball, Milwaukee County Sheriff
      Carl Ashley, Milwaukee County Chief Judge
      John Chisholm, Milwaukee District Attorney
      Chantell Jewell, Superintendent, Milwaukee County Reintegration Center
      Thomas Reed, Milwaukee Public Defender
      Mary Jo Meyers, Chief of Staff, Milwaukee County Executive
      Kelly Bablitch, Chief of Staff, County Board
      Steve Cady, Research & Policy Director, Office of the Comptroller
      Janelle Jensen, Legislative Services Division Manager, County Clerk's Office

REPORT HIGHLIGHTS – August 2024
Courthouse Access Keycards: Controls Needed to Ensure Keycards are Deactivated When Users Terminate
Office of the Comptroller Audit Services Division – Milwaukee WI, Liz Sumner, Milwaukee County Comptroller

Why We Did This Audit

We were contacted by a County manager who found an active access keycard for an employee who separated in 2017. Our initial quick review of Courthouse Complex keycard records indicated many "active" keycards did not match an active employee. The Audit Director spoke with the former Comptroller and agreed a performance audit was appropriate due to a concern that access to the Courthouse facility should be limited to authorized individuals.

What We Found

We found 260 duplicate keycards. After accounting for the duplicates, we had 3,415 total keycards. From the County's payroll system, we matched 1,478 keycards to active County employees while 1,937 keycards did not have an employee match. After additional testing, 11 keycards were matched by the Sheriff, 339 keycards belonged to State Employees and 49 keycards were for parking only leaving 1,538 keycards without a match.

Keycard Review Results	
Category	Count
Courthouse Complex Keycards	3,415
Keycards Matched to County Employee	1,478
Keycards Not Matched to County Employee	1,937
Keycards for "HOC" matched by Sheriff	11
Keycards Matched to State Employee	339
Parking Only Keycards	49
Remaining Unmatched Keycards	**1,538**

We selected certain unmatched keycards for additional review as it appeared there was an internal control deficiency due to the lack of monitoring of issued keycards.

We found issues within the unmatched keycard data including misspellings, records not updated for name changes, and the use of nicknames. There were 55 unmatched keycards with an access point that grants access to the Criminal Justice Facility which is a secure facility. Staff from the CRC reviewed and did not identify any of the names as appropriate while the Sheriff identified 11 who should continue to have access. The County's Family Care program was dissolved at the end of 2016, but 65 active keycards were found in the system with Family Care as their only group access point.

There were 199 active keycards, or 44%, listed for State employees of the District Attorney and the Public Defender that should no longer be active according to a review by their staff. Additional problematic keycards may exist for judicial staff, but unique access codes are not used for the judicial staff which hindered testing.

Facilities' written procedures state that contractors should not be issued permanent keycards, however, we noted 169 permanent keycards issued to contractors. We were provided a list of all temporary keycards in fall of 2023 which totaled 519 keycard records. When we requested a new list in April of 2024, the number of keycards had decreased by 278 to 241 keycard records which would indicate the sunsetting of keycards had occurred at year end 2023. Of the 67 temporary keycards on the contractor list, we cleared 54 of the keycards. Nine of the keycards could not be verified with the information we received due to misspellings or the use of acronyms. Four contractors with active keycards were found to have no payments in 2024 indicating they may no longer be actively performing work for the County.

Facilities was unable to provide a current properly signed agreement with the County's keycard provider. The prior contract's noted extensions expired in 2021 but Facilities signed a retroactive extension letter in 2023 for 2021 to 2024. Hourly rates we found on invoices were more than the 2018 contract amounts; the increase was verbally negotiated per Facilities staff.

What We Recommend

We made 11 recommendations for Facilities that should strengthen their overall policies, establish reviews to assist management in tracking of active keycards and establish strong internal controls including monitoring of issued keycards.

We recommend that Facilities conduct an immediate review of current active keycards to determine which keycards should no longer be active and deactivate the keycards. Facilities should consider using the County's employee number as an identifier.

We recommend that Facilities update policies and procedures in the following areas:
  *Replacement of existing keycards   *Separating employee checklist   *Building or program closure at the County
  *Separation for non-County employees   *Contractor keycard review   *Contract extensions beyond three-year limit
                                                                                     and price increases

We recommend that Facilities conduct regular reviews of keycards in the following areas:
  *By departments of keycards in their area   *By State employers of keycards in their area
  *For contractors in the permanent database *Active duplicate keycards   *Active keycards vs Active County Employees

There are three main buildings that are commonly referred to as the Courthouse Complex at Milwaukee County: the Courthouse, the Criminal Justice Facility, and the Safety Building. All three buildings are interconnected via a skyway. The County Courthouse has publicly accessible floors as well as mezzanines which are located between several of the floors but are only accessible from interior business spaces. The Criminal Justice Facility is a secure facility and by design has very restricted public access to most of the building. The Safety Building has publicly accessible floors and houses County Courts, the District Attorney's Office, and the County Sheriff.

To enter the complex, the public, or those without a County photo ID, are required to go through security. County employees and other authorized users are issued a photo ID to bypass security. In addition to photo IDs issued, there are white access keycards that are issued that provide entrance primarily to office doors throughout the Courthouse Complex. Also, access may be granted to three unstaffed card reader-controlled entrances: Safety Building, Criminal Justice Facility, and 10th street parking annex.

Access to the Courthouse is controlled by the Department of Administrative Services – Facilities Operations & Maintenance Division (Facilities). This division provides a full suite of facility services to County-owned properties including maintenance, major repairs and replacements, capital planning, property management, tenant services, housekeeping, security services, refuse and recycling, grounds maintenance, and snow removal.

For its keycard access service and maintenance, Facilities has contracted with its long-term vendor, the Kain Energy Corporation. The contract covers access for any building of the County located within five miles of the Courthouse. Both Facilities and the Office of the Sheriff issue access keycards. The keycards issued by the Sheriff are for interior access points within the Criminal Justice Facility.

This audit focuses on keycards issued by Facilities with access to the Courthouse Complex. Access keycards are issued to County employees, State employees working in County facilities, appointees, and contractors.

In April of 2023, Facilities issued Administrative Manual of Operating Procedures (AMOP) 14.02 Employee Access Card and Key Issuance and Return. The purpose of the procedure is to provide a documented process on Milwaukee County Employee access keycard and/or physical key issuance and return. Employees and contractors are provided an electronic access keycard for access into authorized areas based on their role and job duties.

Requests to receive an initial access keycard or requests for access changes are made to Facilities utilizing the request form "Authorization for Issuance of Keys and Access Cards." The form must be signed by the requesting department's authorized department head or their designee. The form includes the statement that "upon termination or transfer of an employee, the Department head must return all keys and access keycards to Facilities." For a contractor, the form must be signed by Facilities Management and the following documents must be attached: a photocopy of their driver's license, background check approval

conducted by the Sheriff's Office, and a County picture ID. Contractors are to be set up with only temporary permissions within the access keycard software system.

It is stated in the AMOP that when an employee separation occurs (termination or transfer) the department head/designee must promptly notify Facilities via email or in person to terminate the access for the employee and return all keys/cards to Facilities. Facilities will update the access keycard software system and disable the employee's access. The AMOP section on termination of keycards is silent for State employees working in County facilities, appointees, and contractors.

Facilities issued an internal Office Administrative Procedures Manual dated August 7, 2019, which provides the division's procedures for access keycard issuance and termination by Facilities. While there is information on what to do with access keycards when an employee terminates there is not direction for non-County employees who should no longer have an access keycard, including State employees who have an access keycard, contractors or appointees who have been issued a keycard.

Keycard Access Concerns

We were contacted by a County manager who found an access keycard in the desk of a former employee who had separated from Milwaukee County in 2017. Because the keycard was still active, the manager was able to enter the office suite by swiping the keycard. We contacted another manager in the reporting department who provided us with six access keycards that were issued to former employees. We tested and gained access to the suite because the keycards were still active. Figure 1 shows the keycards we tested.

Figure 1

Source: Photos taken by Audit Services Division staff.

After the initial testing of these keycards, we requested and conducted a quick review of Courthouse Complex keycard records. Our initial review indicated many "active" keycards did not match an active employee due to employees who were known to have separated and in some cases who were deceased. The Audit Director spoke with the former Comptroller and agreed a performance audit was appropriate based upon concerns that access to the Courthouse facility should be limited to appropriate authorized individuals.

In 2021, an in-depth security analysis conducted by an outside consultant for Facilities contained security recommendations including some related to the access keycard system. Concerns were raised about the current vendor and the County's ability to access the keycard system data. In response to this study, in the 2023 Budget, Facilities created a Security Director to be the single point of coordination on security and the implementation of recommendations received. In addition, $3.2 million in ARPA funds were committed towards security upgrades. Per Facilities, a portion of these funds will be used to implement a new keycard access system which is projected to be installed in the summer of 2025.

Our audit objective was to evaluate the current internal controls in place to provide reasonable assurance that only authorized individuals have access to the Courthouse Complex and office suites within the Courthouse Complex.

The standards for internal control in the federal government issued by the Comptroller General of the United States include:
- Management obtains relevant data from reliable internal and external sources in a timely manner based on the identified information requirements.
- Management should establish and operate monitoring activities to monitor the internal control system and evaluate results.
- Management should remediate identified internal control deficiencies on a timely basis.

SECTION SUMMARY

We found almost 2,000 keycards that were still active that had no association with an active employee from the County's payroll system. After additional testing for State employees, judicial officials, and parking only keycards, 1,538 keycards remained without a match.

In fall of 2023, we requested a listing from Facilities of all permanent access keycards issued for the Courthouse Complex to test if any of the active keycards were not associated with an active County employee.

The keycard list we received included the following data elements: an individual ID number, the associated access keycard, first, last, and middle name and group access point. Our preliminary review found two main issues. First, individuals with multiple keycards with the same group access point which potentially indicates that when a duplicate keycard was required the original keycard was not cancelled. The second issue was the visual identification of many keycards issued to individuals who were no longer working at the County.

Table 1 details the data we received from Facilities.

Table 1		
Summary of Key Data Elements in the Keycard Access Data File		
Item	**Definition**	**Data Set Amount**
Individual ID	Number created within the system to correspond to the owner of the keycard or key.	3,415
Keycard No.	Unique number within the system to link to physical keycard. When this field is empty, the record is for a physical key instead of a keycard.	3,675
Access Point Groups	The groups of access points the keycard opens. Facilities provided a 152-page listing of all access points by group.	122 unique groups

Source: Audit Services Division table created from data provided by Facilities.

Based upon this preliminary review, we isolated the keycards we believed to be duplicates. In addition, we conducted a match with active employee information in the County's payroll system to attempt to determine how many keycards should no longer be active and what keycards within the system were lacking a match due to the cardholder not being a County employee.

To obtain an access keycard, an employee must complete a handwritten form that is then signed by an authorized signer from their department (see Exhibit 2). The form asks for the following key data elements: name of employee, department, location, what area the access keycard is for and reason for request. The information is then entered by Facilities when they

create a listing in the data system to issue an access keycard which is based upon the information entered on the form.

We obtained the full population of access keycard data for the Courthouse Complex, so we did not conduct any sampling in our audit. The results we found can therefore be applied to the universe of the Courthouse Complex keycard system. Facilities does, however, manage keycards at other buildings within the County and while our findings cannot be projected to the full population of untested facilities, we would encourage Facilities to conduct a review of other building keycard data to see if compliance with our findings is required.

We found 260 duplicate keycards including multiple people who had four identical keycards active within the keycard database.

Our review of the data found that there were 260 instances of duplicate keycards where the user ID, name, and access group point were identical to another keycard within the data set. This usually occurs when an employee loses their keycard, or it is damaged. Of the 260 duplicate keycards, 179 users had only one duplicate keycard while 37 users had more than one duplicate. We found the highest number of keycards held by one user to be four. There were seven instances of this.

The AMOP, the Policies and Procedures Manual, and the form completed by the employee all state that there is a fee of $10 for the replacement of keycards. We did find evidence that Facilities had posted $800 in revenue in its accounts that was identified as replacement keycard revenue between 2021 – 2023.

There are portions of Facilities' procedures that discuss issuance of keycards when a duplicate keycard is requested, however, it does not address the cancellation of the keycard that is being replaced. Due to the volume of duplicate keycards in the system, Facilities is not consistently cancelling existing keycards when a duplicate keycard is issued, therefore, we recommend:

> 1. Facilities update its internal Procedures Manual related to keycard replacement to direct staff to terminate the old keycard that is being replaced within its keycard database.

> 2. Facilities conduct a review at least semi-annually of all keycards to determine if duplicate keycards exist within the system and deactivate keycards as necessary.

After comparing the active keycards to active employees in the County's payroll system, we found nearly 2,000 active keycards that did not match an active County employee.

We compared the list of permanent keycards received from Facilities to a list of current employees from the County payroll system. After accounting for the 260 duplicate keycards, we had 3,415 individual IDs and an equal number of keycards within the system to attempt to be paired with an active employee. We successfully paired 1,478 keycards. We had 1,937 keycards remaining without a match.

In reviewing the list, we recognized several keycards that were flagged as not matching an employee due to the following factors: misspelling of names, the use of nicknames, and instances where a name changed, such as an employee getting married, where the County's payroll system has the updated name, but Facilities did not. The volume of keycards coupled with the lack of data meant we could not verify every keycard to determine if it should remain active. However, there are several reasons that some keycards would not have a match but should remain as active keycards that we could test for.

Keycard holders include State employees such as district attorneys or public defenders who work in the Courthouse Complex, and appropriate cardholders such as commission members, interns. etc. We attempted to verify State employees, contractors, or appointees however, there was no indication in the name data that we were provided that the cardholders were non-County employees. We were able to review access group points that indicated some of these keycards were part of the District Attorney or Public Defender's Office. We also noted former judges who have active keycards despite becoming an appellate or Supreme Court Justice many years ago.

The lack of cancellation of keycards upon employee termination and the use of a handwritten form that allows for misspellings and use of nicknames along with the lack of updating the system when name changes occur resulted in nearly 2,000 active keycards without a matching entry in the County's payroll system.

In performing our review of the permanent keycard list, we conducted an internal control review. As a part of that review, we identified concerns relating to the control activities due to the lack of monitoring by management of active keycards that should be terminated. We also found access to elected official's offices by employees of prior administrations. Management should design control activities that enhance the monitoring of keycards to achieve objectives and reduce the risk to the County that active keycards are in the possession of individuals who are no longer authorized to hold the keycard. Due to the current lack of monitoring of issued keycards which we believe is an internal control deficiency, there is an immediate need to conduct an overall review of active keycards, therefore, we recommend:

> 3. Facilities conduct an immediate review of current active keycards to determine which keycards should no longer be active and then deactivate the keycards.

After we removed matched keycards and performed additional testing, there were 1,538 keycards that remained unmatched.

We conducted further review of the 1,937 keycards that were flagged as unmatched. We did this by looking at the group access code and by reviewing the public listing of Milwaukee County Circuit Court Judges, Court Commissioners and Court reporters and any other identifiable information in the name field. Once we removed users for additional review, there were 1,061 remaining as unassigned to a group that underwent further testing.

Table 2 shows the type and number of keycards we reviewed for further testing.

Table 2			
Count by Category of Permanent Keycards with No Matching County Employee			
Category	Keycards with No County Employee Match	Keycards Cleared After Testing	Remaining Keycards
Unassigned	1,061	0	1,061
HOC Drivers*	55	11	44
Parking Only	49	49	0
Family Care	65	0	65
District Attorneys	320	185	135
Public Defenders	137	73	64
Judges, Court Commissioners and State Court Staff	81	81	0
Contractors	169	0	169
Total	**1,937**	**399**	**1,538**

*HOC was the House of Correction which is now called the Community Reintegration Center.
Source: Audit created table based on data from Facilities.

We selected certain unmatched keycards for additional review for a variety of reasons including the level of risk to the County, the appropriateness of the keycard within the permanent system, and examples of using datapoints to ease the monitoring for management. Including the County's payroll system's employee numbers in the database for keycards would help management to sort and oversee the active keycard system.

HOC Driver

We isolated the keycards that were unmatched with a current County employee that contained the access group HOC Driver. This access point was selected for review because it grants access to the County's Criminal Justice Facility which is a secure facility. The HOC driver group name provides access to: "CJ – Loading Dock", "CJ Main Lobby Dr" and "CJ Lobby Outer" at the Criminal Justice Facility. We sent the list of 55 keycards to staff at the Community Reintegration Center (formerly the HOC) and the Office of the Sheriff. The CRC did not identify any of the individuals as keycards that should continue to have access while the Sheriff identified 11.

Parking Only

There were 49 keycards that only allowed parking access. These keycards have no access to the Courthouse Complex buildings or offices within the buildings. The lots included in the Courthouse Complex are the Museum lot, the Courthouse Annex lot, and the Medical Examiner Surface lot. Most of the keycards are for the Museum lot although some keycards had access to more than one lot. Of the 49 keycards, 28 do not have a name associated with the keycard. Data found in the name section includes generic items such as Parking 1 or News #2. Some of the individuals are appointees serving on boards such as the Ethics
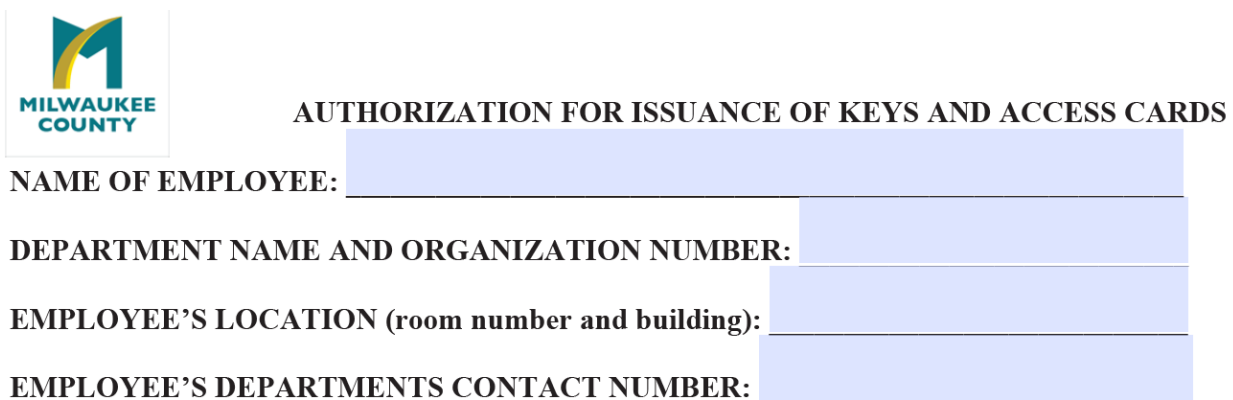
Board. There is no field in the data we were provided that indicated these cardholders were appointees rather than County employees.

It should be noted that there were additional keycards in the database beyond those with Parking only access that did not have a proper name in the name field. These keycards included ones issued to the fire department and spare keys for deputies and the Facilities G1 office which we deemed appropriate for the permanent keycard database.

Figure 2 shows a screenshot of the paper form required to be filled out by Facilities to receive a keycard. The form allows an employee to write down their name without requiring it to match the name that is entered into the County's payroll system. The information written down by the employee is then keyed into Facilities keycard system.

Figure 2

AUTHORIZATION FOR ISSUANCE OF KEYS AND ACCESS CARDS

NAME OF EMPLOYEE: _____

DEPARTMENT NAME AND ORGANIZATION NUMBER: _____

EMPLOYEE'S LOCATION (room number and building): _____

EMPLOYEE'S DEPARTMENTS CONTACT NUMBER: _____

Source: Facilities AMOP14.02

Dayforce Employee Identification Number

The County's payroll system generates a unique six-digit employee number for every employee. We did not find a space on the required form for this number, nor was the number entered in their data system.

During our review of the overall unmatched batch of keycards and some of the keycards which were selected for additional review, we found numerous issues:

- Misspelled names
- Name changes made within County's payroll system not carried over to the Facilities database
- Use of nicknames
- State employees and parking only keycards not identified within the database

The inclusion of both the County issued unique employee ID and identifiers for State employees, contractors, or appointees would provide management with a simpler way to identify proper active keycards which would make it easier to monitor the keycard access program.

Adding this information to the form and the system would have allowed for an immediate separation of data for County versus non-County employees and correct for the current misspellings, use of nicknames and name changes, therefore, we recommend:

> 4. Facilities pursue the addition of the County issued employee number onto its Card Access Request Form and enter this information into the individual's record within their keycard access system. An identifier for non-County employee keycards should also be implemented to assist in tracking of non-employee keycards for responsible departments.

According to an interview with staff within Facilities, as of November 2023, a termination list is emailed from the County's information technology division every Monday. Facilities staff will then deactivate the applicable keycards of people on the list. However, other staff interviewed expressed frustration of not knowing when people leave and not being made aware of terminations by departments.

The Department of Human Resources issued AMOP 02.03.07 which provides the Milwaukee County Employee Separation Checklist which details tasks departments are to complete during employee separation. This list instructs the department to collect the keycard from the separating employee but does not include direction to the department to return the keycard to Facilities where it will be deactivated and destroyed.

While the Facilities' AMOP and Procedures Manual do include language regarding notification to Facilities regarding terminations, a review both testing active keycards to active employees in the County's payroll system and a review of keycard holders by department heads to confirm the employees on the listing should remain is not currently being conducted, therefore, we recommend:

> 5. Facilities should work with the Department of Human Resources to update the form contained in AMOP 02.03.07 to instruct departments to return collected keycards from separating employee to Facilities.

> 6. Facilities should develop written policies and procedures to conduct an annual review of active keycards to active employees within the County's payroll system and a review by each department of keycards issued with their approval.

The County's Family Care program was dissolved at the end of 2016, but 65 active keycards were found in the system with Family Care as their only group access point.

We found that there were 65 keycards that had the group access point of Family Care. Family Care was formerly a department at Milwaukee County that operated the State Family Care program which coordinated all long-term care services, including home and community-based services and institutional services for eligible elders and individuals with disabilities who required publicly funded long-term care services. Due to a change in State law, the Department of Family Care was abolished at the end of 2016.

According to an interview with Facilities, they can cancel the whole group name in the keycard system, however, this did not happen when Family Care was abolished, therefore, we recommend:

> 7. Facilities should add specific written policies and procedures on the deactivation of access keycards upon the termination of County programs or buildings.

There were 199 active keycards listed for State employees of the District Attorney and the Public Defender's offices that should no longer be active according to a review by their staff. Those keycards account for 44% of keycards reviewed by these departments. Additional problematic keycards may exist for judicial staff, but unique access codes are not used for the judicial staff, which hindered testing.

District Attorneys

The District Attorney's Office is a blended staff with both State and County employees. In the data set, there were six access group names that included a reference to the District Attorney (DA). We provided a preliminary list to the DA's Office for review. After reviewing that list and our comparison of the DA's Office list of active employees they provided, it was found that 135 out of 320 keycards should no longer be active.

According to an interview with staff at the DA's Office they had implemented a new process of collecting keycards that was developed to monitor when employees are terminated, leave, or retire. Under the new system, the office notifies Facilities immediately via email on the day of departure to deactivate the keycards. The keycards are collected to be turned in to Facilities. Because of the notification sent to Facilities upon an employee's departure, the DA's Office does not send termination lists to Facilities currently.

Public Defenders

The Public Defender's Office does not contain any County employees but does have State employees who require access to the Courthouse Complex. We isolated keycards that contained the access point listed as "075 Public Defender." We sent the list of 137 keycards to the Public Defender's Office. They informed us that 64 keycards were terminated employees or individuals they did not recognize. One cardholder is now a judge.

According to an interview with staff at the Public Defender's Office they do not notify Facilities when someone is terminated or to report lost keycards. Like the DA's Office, the Public Defender's Office informed us that they are currently using an offboarding checklist to collect badges and identification keycards from terminated employees.

Judges, Court Commissioners and Court Reporters

To confirm unmatched active keycards that belong to active judicial staff, we compared the public list of current judges, court commissioners and court reporters and found that 81 of the unmatched keycards were people on those lists. According to the staff within the Chief Judge's Office, they inform Facilities by returning the keycards in person or via email to deactivate a keycard that is not returned.

At the County there is a unique situation with the need for State employees of the DA, Public Defender, and Chief Judge's Office along with elected judges and other judicial staff to have permanent access keycards. The AMOP and policies and procedures do not directly address the termination of staff in this situation nor does Facilities have easy access to confirm which keycards should be terminated, therefore we recommend:

> 8. Facilities update its AMOP and Procedural manual to include clear direction for non-County access keycard holders such as State employees when access keycards should be terminated.

> 9. Facilities should develop written policies and procedures to conduct a periodic monitoring process to determine keycards that should be deactivated within the system that are from the DA, Public Defender, and Chief Judge's Office along with elected judges and other judicial staff.

Contractors Within the Permanent File

According to the AMOP and the Procedures Manual, contractors should only be issued a temporary keycard from Facilities. However, we noted 169 keycards within the data set of permanent keycards that contained information that indicated that the user was a contractor. This included keycards where the names were contracted companies such as ABM. In addition, some keycards have access points that listed them as a contractor.

Of the 169 keycards, 105 keycards had a group access point of "CJF WCS." The County contracts with Wisconsin Community Services via the Chief Judge's office. We sent the list of keycards with WCS access point to his office for verification if the named keycard holder should still have access for the Courthouse Complex. Of the 105 keycards that were sent, 36 were flagged as former staff and users that should no longer be in the County system.

Within the contractor keycards in the permanent file were 39 keycards that were listed with an access point of ABM, the County's former vendor for janitorial services. The County began using a new vendor for janitorial services as of March 31, 2023, and the last payment to ABM was listed as May 1, 2023, in the County's financial system. Per Facilities' policies, these keycards should have been temporary keycards and should have expired on 12/31/23.

Temporary Keycard File Review

As noted above, per the AMOP and the Procedures Manual, contractors should only be issued a temporary keycard from Facilities. According to an interview with Facilities, keycards can be programmed to expire on whatever date is entered including in future years. Staff for Facilities stated, for most contractors, the keycards expire on December 31 and need to be reset every year. According to staff when a temporary keycard is entered the system requires the "sunset date" field be completed. We were provided a list of all temporary keycards in Fall of 2023 which totaled 519 keycard records. When we requested a new list in April of 2024, the number of keycards had decreased by 278 to 241 keycard records which would indicate the sunsetting of keycards had occurred at year end 2023.

We were provided a list of 67 keycards that were marked as contractors within the temporary database. We found four of the keycards that were listed on both the temporary and the permanent file lists provided by Facilities. We then reviewed the list for keycards that were identified as a departmental keycard or if the vendor listed had received a payment from the County in 2024.

Table 3 shows the results of our testing of contractor marked keycards within the temporary file.

Table 3	
Test Results of Temporary Keycard File	
No Issues Found – either departmental keycard or vendor was paid in 2024	54
Untestable due to misspellings or acronyms	9
No payments in 2024	4
Total	67

Source: Audit created table based on data from Facilities.

Of the 67 keycards on the temporary list, we found 54 of the keycards to be associated with a vendor who had received payments from the County in 2024 or belonged to a County department including interns. Nine of the keycards could not be verified with the information we received due to misspellings or the use of acronyms. Four keycards were found to have no payments in 2024:

- Dirty Ducts – one keycard – Last paid 11/6/2023
- Indoor Air Quality – one keycard – Last Paid 11/13/2023
- Butters-Fetting – one keycard – Last Paid 12/03/2021
- US Imaging – one keycard – Last Paid 06/15/2020

Facilities has policies regarding the proper creation of keycards for contractors, it does not currently include a review of the keycards to ensure the policy is being followed, therefore, we recommend:

> 10. Facilities develop written policies and procedures to conduct a review of keycards within its permanent database to determine if contractor keycards are in the database and should be moved to the temporary database.

Facilities was unable to provide a current properly signed agreement with Kain Energy Corporation. The contract's noted extension expired in 2021 but Facilities signed a retroactive extension letter in 2022 for 2021 to 2022 and another retroactive extension in 2023 for the years 2021 to 2024. Hourly rates we found on invoices were more than the 2018 contract amounts per a verbal agreement with Kain according to Facilities staff.

Facilities has contracted with Kain Energy Corporation (Kain) under Section 44 of Milwaukee County Code of Ordinance which governs public works contracts. Public works contracts are used for purchase of service contracts for maintenance of County buildings. The bid was executed under the rules of the Time and Materials contracts which fall under the ordinance.

Time and Material contract standards for contracts under $25,000 applied. Between 2022 and June 30, 2024, the County paid $32,054 to Kain.

Facilities also has Standard Operating Procedures (SOP) for Time and Material contracts available on Procurement's intranet site. The SOP directs staff on how to comply with the ordinance. The standards included in the SOP are that bids must be solicited and that the contract should be fully signed by the required County entities via the County's Docusign system. Contracts are to be for three years maximum but the SOP states, "While the Contract should only be used for three years, if award delayed or other similar reason A&E may extend the contract beyond three years."

The most recent contract that was fully signed and routed through the DocuSign system was executed with Kain on March 21, 2018, with allowable renewals until April of 2021. Facilities solicited bids in 2021 and Kain was the sole bidder. Facilities executed a one-page extension that aligned with the suggested extension letter in the SOP in April of 2022. This letter extended the contract from April of 2021 to May of 2023. A second letter was issued in April of 2023 with extension dates of May 2021 to May 2024. Both extensions were signed by Facilities and the vendor. According to Facilities staff, the keycard system is a sole source system and there was no alternative to using Kain after they were the sole bidder.

The 2018 Bid Summary Page for Compensation states that the keycard access service and maintenance hourly rate is $150, the overtime rate is $225, and hours worked on Sundays and Holidays is $300. When we reviewed invoices paid to Kain in 2022 and 2023, the hourly rate paid to Kain was listed at $155 per hour and some of the invoices included a truck trip charge of $55 and a fuel surcharge of $25 which were not listed in the 2018 Bid Summary Page.   According to Facilities staff, a verbal agreement was executed with Kain for the increase in costs.

The current Facilities departmental procedure does not clarify additional reasoning for extending T&M contracts beyond three years or price increases nor is there any specification included regarding what documentation should be retained, therefore, we recommend:

> 11. Facilities add written policies and procedures on Time & Material contracts to specify what reasons are valid when a contract is extended beyond the current three-year limit along with any required documentation. In addition, clarify what documentation is required when a price increase occurs.

EXHIBIT 1 - AUDIT SCOPE AND METHODOLOGY

The objective of this audit was to evaluate the current internal controls in place to provide reasonable assurance that only authorized individuals have access to the Courthouse Complex and office suites within the Courthouse Complex.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We limited our review to areas specified in this Scope and Methodology Section. During the course of our audit we:

- Identified and assessed internal controls as to their significance to the audit objectives including concerns related to policies and procedures, control environment, control and monitoring activities, and information and communication. In performing our review of the permanent keycard list, we conducted an internal control review. As a part of that review, we identified concerns relating to the control activities due to the lack of monitoring by management of active keycards that should be terminated which we deemed an internal control deficiency.

- Reviewed relevant County Board proceedings, Resolutions, Administrative Manual of Operating Procedures (AMOPs), County Employee Handbook, and budgets, regarding issues, concerns, recommendations, and procedures related to the security of the Courthouse Complex as it relates to the issuance and termination of keycards.

- Assessed whether any component of the audit had a Diversity, Equity and Inclusion component but did not identify any area.

- Conducted internet research to identify studies and audits that provide useful background information, relevant industry standards, performance measures, best practices comparisons, and recommendations concerning building access keycards.

- Obtained access keycards that were issued to former employees from two County managers and tested the keycards for access to suites within the Courthouse Complex.

- Obtained a list of active and terminated County employees from Dayforce as of October 2023 and matched the active County employee list with active permanent access keycard list from Facilities.

- Obtained a list of active permanent and temporary access keycards for the Courthouse Complex from Facilities keycard system as of October 2023 and analyzed the list of active permanent keycards to isolate keycards that should no longer have access

including contractors, former employees, former State employees and access to closed facilities.

- Analyzed the list of active permanent access keycards for duplicate keycards where an individual cardholder (sorting by their Individual ID number, not their name) with multiple keycard numbers that also give the same access.

- Obtained and reviewed the temporary access keycard list by contractors for the Courthouse Complex from Facilities to verify that temporary keycards are being sunset at the end of the year as stated in Facilities' procedures manual by reviewing contracts whose employees have active permanent access keycards to the Courthouse Complex from Docusign and Legistar and payment history in the current and past financial systems, Power BI, and Infor.

- Reviewed the public listing of Milwaukee County Circuit Court Judges, Court Commissioners and Court reporters, Appellant Court Judges and State Supreme Court Justices.

- Interviewed and corresponded with DAS-FM, Sheriff's Office, DA's Office, County Courts, and other County and non-County departmental staff, to obtain a clear understanding of the procedures used to issue and terminate keycard access to the Courthouse Complex including verifying lists of active and terminated individuals that should no longer have keycard access.

- Obtained and reviewed the Facilities' Office Administration Procedures, the County's AMOP 14.02 – Employee Access Card and Key Issuance and Return, and the County Employee Handbook regarding building access keycards and keys.

- Obtained and reviewed the 2018 Kain Energy contract and two extension letters for 2022 and 2023.

- Obtained and reviewed the confidential 2021 Facilities security review of the Courthouse Complex and Coggs building consultant report.

- Obtained access keycard replacement fees collected by Facilities from the County's financial system Infor for the years 2021-2023.

- Obtained invoices and payments made to Kain Energy for service and maintenance of the current keycard system TAC INET by Facilities and the Sheriff from the County's financial system Infor for the years 2022 through June 2024.

- Reviewed Department of Human Resources issued AMOP 02.03.07 on the separation checklist for employees.

Exhibit 2

AUTHORIZATION FOR ISSUANCE OF KEYS AND ACCESS CARDS

NAME OF EMPLOYEE: _____

DEPARTMENT NAME AND ORGANIZATION NUMBER: _____

EMPLOYEE'S LOCATION (room number and building): _____

EMPLOYEE'S DEPARTMENTS CONTACT NUMBER: _____

KEY REQUESTED FOR: _____

ACCESS CARD REQUESTED FOR WHAT AREA: _____

REASON FOR REQUEST: _____

MIRROR CURRENT EMPLOYEES ACCESS: _____
                                                                          Name of that employee

KEY NUMBER   1. _____

                  2. _____

                  3. _____

                  4. _____

THERE WILL BE A $10.00 CHARGE FOR EACH LOST KEY AND ACCESS CARD.

<u>Requests</u> for keys and access cards are to be sent to Facilities Management, room G-1 of the courthouse.

A record of employees who have been issued keys and or access cards will be maintained.

<u>Upon termination or transfer of an employee, the Department Head must return all keys and access cards to Facilities Management, room G-1 of the courthouse, and not to transfer them to another employee.</u>

_____   _____   DATE: _____
     Signature of Department Head   Typed or printed name of Department Head

KEY/CARD RECEIVED BY: _____   DATE: _____

~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~ FOR OFFICE USE ONLY ~~~~~~~~~~~~~~~~~~~~~~~~~~~~

_____   _____   DATE: _____
     Signature of Facilities Management   Printed name of Facilities Management

RECORDED IN H DRIVE: _____   **RECORDED IN BOOK:** _____

COPY PLACED IN: _____   **ANNEX PARKING APPROVED BY:** _____

Exhibit 3

CONTRACTOR FORM
CARDS AUTHORIZATION FOR ISSUANCE OF KEYS AND ACCESS

NAME OF COMPANY: _____

NAME OF EI\IPLOYEE: _____ _____

EMPLOYEE'S DRIVERS LICENSE NUMBER: _____
DRIVERS LICENSE EXPERATION DATE: _____

EMPLOYEES CONTACT NUMBER: _____ __

KEY REQUESTED FOR WHAT AREA: _____

ACCESS CARD REQUESTED FOR WHAT AREA:

REASON FOR REQUEST:

MIRROR CURRENT EMPLOYEES ACCESS:__ __ __ __ __ __ __ __ __ __ __ __
Name of that employee

KEY NUI\IBER   I. ....

2. _____

3. _____

THERE WILL BE A $10.00 CHARGE FOR EACH LOST KEY AND ACCESS CARD.

Requests for keys and access cards are to be sent to Facilities Management1 room G-1 of the courthouse.

A record of employees who ha\'c been issued keys and or access cards will be maintained.

Upon termination or transfer of an employee. the Department Head must return all keys and access cards to Facilities Management. room G-1 of the courthouse. and not to transfer them to another employee.

DATE: ....
Signature of Department Head   Typed or printed name of Department Head

KEY/CARD RECEIVED BY:_____ DATE: _____

---------------------------------FOR OFFICE USE ONLY ---------------------------------

DATE: ....
_____ _____   _____
Signature of Facilities   Printed name of Facilities
Manageme11t   Management

RECORDED I N H DRIVE: _____   RECORDED IN BOOK: _____

COPY PLACED IN: _____   ANNEX PARKING APPROVED BY: _____

Stuart Carron

Director, Facilities Management Division

633 W. Wisconsin Ave., Suite 700

Milwaukee, WI 53203

August 11, 2024

Jennifer Folliard, Director of Audits

Re: "Courthouse Access Keycards: Controls Needed to Ensure Keycards are Deactivated When Users Terminate" - Audit Report Response

Dear Ms. Folliard,

This letter is in response to your Audit Services Division eleven recommendations to address the issues raised in the audit of our Courthouse Access Controls system.

We would like to thank Audit Services for this comprehensive review, report, and recommendations. Facilities Management is committed to providing safe and secure facilities for our staff, occupants, and visitors, and we recognize that this is critical for our courthouse complex. We also recognize that there are current gaps in our processes and systems that could potentially compromise this and are already actively taking steps to remedy the situation. Your recommendations are all sound and will further improve our action plan.

It's important to note that not only is the software system that runs our access controls severely outdated, the AMOP processes in place for access control relies on the active management of not just Facilities, but also employee managers in every department that occupies our facilities. Replacement of the current technology is currently underway, and an overhaul of the AMOP is also planned.

Below are specific responses to the eleven recommendations in the Audit Report.

Recommendation 1
Facilities update its internal Procedures Manual related to keycard replacement to direct staff to terminate the old keycard that is being replaced within its keycard database.

1. Facilities Management is in the process of installing a new access control system (trade name C-Cure 9000) that will automatically deactivate old keycards once a replacement is issued.
2. Facilities Management will also update AMOP 14.02 by or before year-end 2024 to update procedures to include clear, step-by-step instructions for staff on how to deactivate old keycards. This will include screenshots, flowcharts, or other visual aids to ensure staff can follow the process easily and accurately. We will conduct training sessions for all relevant staff on the new procedures for keycard replacement and deactivation. The revised procedure will also include regular audits conducted to ensure compliance with these updated procedures.

Recommendation 2
Facilities conduct a review at least semi-annually of all keycards to determine if duplicate keycards exist within the system and deactivate keycards as necessary.

1. Facilities Management is in the process of installing a new access control system (trade name C-Cure 9000) that will scan the keycard database for duplicates on a regular basis. The software can flag duplicate entries for review and automatically deactivate any keycards identified as duplicates.
2. Facilities Management will also update AMOP 14.02 by or before year-end 2024 to update procedures to establish a schedule for annual manual reviews by dedicated staff. These reviews should involve cross-referencing keycard records with employee and contractor databases to ensure no duplicates are present.

Recommendation 3
Facilities conduct an immediate review of current active keycards to determine which keycards should no longer be active and deactivate the keycards.

1. Facilities Management will conduct a full audit of all active keycards immediately. This involves cross-referencing the keycard database with current employee and contractor records to identify keycards that should be deactivated. Any discrepancies found will be addressed promptly by contacting departments and managers to confirm that individuals with active keycards are still employed or contracted. We will deactivate keycards for individuals who are no longer associated with the organization.

2. Facilities Management will also update AMOP 14.02 to create a clear protocol for the immediate deactivation of keycards identified as no longer needed. This protocol should include steps for notifying relevant personnel, updating the keycard management system, and physically retrieving deactivated keycards if necessary.

Recommendation 4
Facilities pursue the addition of the County-issued employee number onto its Card Access Request Form and enter this information into the individual's record within their keycard access system. An identifier for non-County employee keycards should also be implemented to assist in tracking of responsible departments for non-employee keycards.

1. Facilities Management will also update AMOP 14.02 to update the Card Access Request Form to include a mandatory field for the County-issued employee number. Ensure that this number is entered into the keycard access system when a new keycard is issued or an existing one is updated. This will help in easily identifying and managing keycards issued to County employees. We will also Implement a unique identifier system for non-County employees (e.g., contractors, vendors).
2. Facilities will update the keycard management system to accommodate these new fields and ensure the system can generate reports that include these identifiers for better tracking and auditing. If the current software proves incapable, we will include this requirement in the replacement C-Cure system implementation.

Recommendation 5
Facilities should work with the Department of Human Resources to update the form contained in AMOP 02.03.07 to instruct departments to return collected keycards from separating employees to Facilities.

1. Facilities will advise the Human Resources department and suggest revision of their AMOP 02.03.07 form to include clear instructions for departments to return collected keycards to Facilities when an employee separates from the organization. Ensure the updated form highlights this step prominently. Facilities will collaborate with the HR department as needed to integrate the keycard return process into the employee offboarding checklist. The goal is to ensure that returning keycards becomes a standard procedure when employees leave the organization.

Recommendation 6
Facilities should develop written policies and procedures to conduct on at least an annual basis a review of active keycards to active employees within the County's payroll system and a review by each department of keycards issued with their approval.

1. Facilities Management will develop and document a formal policy that mandates an annual review of all active keycards and will update AMOP 14.02 to include this requirement. This policy should detail the responsibilities of each department in verifying the status of keycards issued to their employees. This process will require each department to affirm each and every active keycard they have approved and issued and will deactivate any not confirmed valid. This review will annually verify that all keycards are accounted for and that they have been issued appropriately.

Recommendation 7
Facilities should add specific written policies and procedures on the deactivation of access keycards upon the termination of County programs or buildings.

1. Facilities Management will develop and document a formal policy and procedures for the deactivation of access keycards when a County program is terminated or a building is closed and will update AMOP 14.02 to include this requirement. This policy will create a standardized checklist to be used during the closure of any County program or building and establish a clear communication protocol to ensure that all relevant departments are informed of program terminations or building closures.

Recommendation 8
Facilities update its AMOP and Procedural Manual to include clear direction for non-County access keycard holders such as state employees on when access keycards should be terminated.

1.   Facilities Management will develop and document a formal policy and procedures for the deactivation of access for non-County access keycard holders such as state employees and will update AMOP 14.02 to include this requirement.

Recommendation 9
Facilities should develop written policies and procedures to conduct a periodic monitoring process to determine keycards that should be deactivated within the system that are from the DA, Public Defender, and Chief Judge's Office along with elected judges and other judicial staff.

1.   Facilities Management will develop and document a formal policy and procedures for the deactivation of access for non-County access keycard holders such as state employees and will update AMOP 14.02 to include this requirement. We will develop a coordination protocol with the judicial offices to ensure timely communication regarding any changes in staff or access needs. This includes creating a liaison role or committee that meets regularly to discuss keycard management and address any issues promptly.

Recommendation 10
Facilities develop written policies and procedures to conduct a review of keycards within its permanent database to determine if contractor cards are in the database and should be moved to the temporary database.

1. Facilities Management is in the process of installing a new access control system (trade name C-Cure 9000) that will establish a clear segmentation within the keycard management system to distinguish between permanent and temporary keycards. We will ensure that contractor keycards are categorized correctly and moved to the temporary database when necessary.
2. Facilities Management will also update AMOP 14.02 by or before year-end 2024 to update procedures to include clear, step-by-step instructions for staff on how to classify, segment, audit and deactivate contractor and other temporary keycards.

Recommendation 11
Facilities add written policies and procedures on Time & Material contracts to specify what reasons are valid when a contract is extended beyond the current three-year limit along with any required documentation. In addition, clarify what documentation is required when a price increase occurs.

1. Facilities Management will update its internal policy on T&M contracting by or before year-end 2024 to update procedures to specify what reasons are valid when a contract is extended beyond the current three-year limit along with any required documentation. In addition, the policy will clarify what documentation is required when a price increase occurs.

Conclusion

Addressing the issues identified in the audit is vital for ensuring the security and integrity of our County facilities. The proposed solutions provide a comprehensive framework for correcting current deficiencies and establishing robust procedures for the future. By updating our access controls software system, keycard management policies, enhancing our monitoring processes, and fostering inter-departmental cooperation, we can significantly reduce the risk of unauthorized access and improve overall safety. Commitment to these changes will demonstrate our dedication to protecting our facilities and the people who use them, laying a foundation for continued security and operational excellence.

Stuart Carron

Your Name

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