STATUS OF IMPLEMENTATION – AUDIT SERVICES DIVISION REPORT RECOMMENDATIONS

Audit Report Title: County IDs: Progress is Being Made, but Work Remains to Strengthen Security

File Number: 25-884 **Audit Issued:** December 2025
Status Report Date: June 2026 **Department:** DAS - Facilities Management Division/Office of the Sheriff

Open Recommendations

<table>
<tr><th colspan="2">Recommendation #3</th></tr>
<tr><td colspan="2">Recommendation – December 2025
When the new pedestal system is installed, Facilities and the Sheriff’s Office should update relevant policies and procedures within six months of installation.</td></tr>
<tr><td>Deadlines Established Y/N?</td><td>Y</td></tr>
<tr><td>Date</td><td>Management Comments:</td></tr>
<tr><td>Current – June 2026</td><td>Office of the Sheriff Update:
As the pedestal system has not yet been installed, there has been no need to update our policy related to this recommendation.

DAS - Facilities Management Division and Office of the Sheriff Update:
This recommendation remains in progress. FMD Security has received the technology required to set up the entrance validation readers. During the last week of June 2026, FMD Security will conduct a walk-through with O&M and the Sheriff's Department to confirm the final installation locations and ensure the planned setup meets operational expectations.

The entrance validation technology is scheduled to be installed in early July 2026, with an estimated completion date of July 17, 2026.

After installation, FMD Security will partner with the Sheriff's Department to update the applicable procedures and provide training on the use of the entrance validation readers. The updated procedures and training will address how IDs are presented, how credential status is reviewed, how displayed credential information is used by entry staff, and how exceptions or access concerns are escalated.

Expected Completion: 3rd Quarter 2026.</td></tr>
<tr><td>Audit Report Response – December 2025</td><td>Office of the Sheriff:
We will update our policies and training manual upon installation.

DAS – Facilities Management Division:
Facilities Management will partner with the Sheriff’s Office to update relevant procedures tied to the entrance validation reader process within six months of installation. This will include clear operational expectations for the entry stations and defined responsibilities for maintaining the accuracy of credential records and entrance configuration. The planned solution includes five employee entrance</td></tr>
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	validation readers and associated tablets across two Courthouse entrances, two Safety Building entrances, and one Criminal Justice Facility entrance, and the system will display the credential holder's information on screen when an ID is presented.

Recommendation #4	
Recommendation – December 2025 *Upon the final implementation of Phase Two, Facilities should provide the Audit Services Division with documentation that the automatic deactivation of separated employees and updating of transferred employees is occurring as planned.* Also see Recommendations 2, 6, and 7 of Courthouse Access Status Report.	
Deadlines Established Y/N?	Y
Date	**Management Comments:**
Current – June 2026	DAS – Facilities Management Division Update: This recommendation remains in progress. FMD Security continues to work with IMSD on Phase Two of the Dayforce and CCURE integration. Phase Two is intended to expand the daily data feed to include employee separations and employee transfers so that access records are updated automatically when employment status or department assignment changes. Since the original response, hardware updates were required for the access panels across the campus in order for the appropriate updates to occur from Dayforce into CCURE. County contractors and IMSD have installed the required hardware on the access panels, and configuration of this technology is currently underway. Until Phase Two is fully active and validated, FMD Security will continue to use available interim controls to support timely deactivation and access record accuracy. Once configuration is complete, FMD Security will complete validation testing to confirm that separated employees are automatically deactivated and transferred employees are updated as intended. After testing is complete, FMD Security will provide Audit Services with documentation demonstrating that the process is operating as planned. Expected Completion: 4th Quarter 2026.

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Audit Report Response – December 2025	Phase Two of the system integration will expand the daily Dayforce data feed to include employee separations and employee transfers to support automatic updates within the access control system. This functionality is anticipated to be fully active by the end of the second quarter of 2026 to ensure the process is operating properly end to end. To bridge the gap between now and full Phase Two activation, Facilities Management is using weekly termination reports from Power BI to validate separation activity and to support timely deactivation where needed to maintain system accuracy. Following full activation, Facilities Management will complete validation testing and will provide the Audit Services Division with documentation demonstrating that separated employees are being automatically deactivated and that transferred employees are being updated as intended.

Recommendation #5	
Recommendation – December 2025 *Facilities should develop and document a process to periodically verify that the County's human resources information system data updates are being captured in the new system.* Also see Recommendations 2, 6, and 7 of Courthouse Access Status Report.	
Deadlines Established Y/N?	Y
Date	**Management Comments:**
Current – June 2026	DAS – Facilities Management Division Update: This recommendation remains in progress. FMD Security continues to work with IMSD on the Dayforce and CCURE integration needed to support HR driven updates in the access control system. This process is intended to confirm that employee status changes, department updates, separations, and transfers are being captured accurately in CCURE. Once configuration is complete, FMD Security will document a periodic verification process to confirm that HR driven updates are being captured correctly in CCURE. This process will be added to the FMD Security SOPs and incorporated into the access audit process conducted every two months. The verification process will compare available Dayforce information, CCURE records, and Power BI reporting to confirm that access records are being updated as intended. Until the process is fully configured and validated, FMD Security will continue using available interim controls, including Power BI reporting and department review, to support access record accuracy and timely deactivation. Expected Completion: 4th Quarter 2026.

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Audit Report Response – December 2025	Facilities Management will document and implement a periodic verification process that confirms HR driven updates are being captured correctly in the new system. This work will be completed by the end of the second quarter of 2026. Until the new system is fully implemented and stabilized, Facilities Management will continue leveraging weekly Power BI termination reporting as an interim control to support ongoing accuracy and timely deactivation.

Recommendation #6	
Recommendation – December 2025 *Facilities should work with the Department of Human Resources to update the form contained in AMOP 02.03.07 to instruct departments to return to Facilities the collected County IDs from separating employees.* Also see Recommendation 1 of Courthouse Access Status Report.	
Deadlines Established Y/N?	Y
Date	**Management Comments:**
Current – June 2026	DAS – Facilities Management Division Update: This recommendation remains in progress. FMD Security will coordinate with the Department of Human Resources to update the employee separation process so collected County IDs are returned to FMD Security for proper control and secure disposition. After the full transition, O&M will no longer be responsible for handling County IDs. Under the new process, County IDs and access badges will be treated as the same credential and will be returned to FMD Security when an employee separates, transfers, or no longer requires access. Once the Courthouse Complex conversion is complete and the appropriate technologies are finalized and configured in CCURE, FMD Security will update its SOPs to include the return, deactivation, and secure disposition process for County IDs and access badges. FMD Security will then coordinate with the Department of Human Resources to update the applicable separation process and ensure departments receive clear direction on where collected credentials must be returned. The entrance validation readers will also provide an additional control at staff entry points. If a separated employee retained a County ID after leaving employment, the

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	credential would not validate once deactivated in CCURE, allowing the issue to be identified at the entrance. Expected Completion: 3rd Quarter 2026.
Audit Report Response – December 2025	Facilities Management will work with the Department of Human Resources to update the employee separation process so that collected County IDs are returned to Facilities Management for appropriate control, including secure disposition and to reduce the risk of expired IDs being used to bypass screening. This will be completed by March 2026.

Recommendation #7	
Recommendation – December 2025 *Facilities should serve as the County's authority over the new system and apply its policies and procedures at other card issuing locations.*	
Deadlines Established Y/N?	Y
Date	**Management Comments:**
Current – June 2026	DAS – Facilities Management Division Update: This recommendation remains in progress. FMD Security is serving as the lead operational authority for the County ID and access badge process within the CCURE environment. As part of this transition, FMD Security has developed SOPs that establish standard processes for access requests, approvals, credential issuance, access modifications, access removal, audits, replacement credentials, temporary access, contractor access, and record retention. The Courthouse Complex rollout remains the initial implementation point for these standards. Once the remaining Courthouse Complex technology is installed, configured, and validated, FMD Security will use the finalized process to guide other County card issuing locations. This will help ensure County IDs and access badges are issued, modified, and deactivated under a consistent Countywide process. FMD Security will also work with IMSD and other card issuing locations to define appropriate system access for staff who require access to CCURE as part of their job duties. This will support a controlled process for approving users, limiting credential issuance permissions, and applying FMD Security standards across locations that issue County credentials. Expected Completion: 4th Quarter 2026.

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Audit Report Response – December 2025	Facilities Management will serve as the County's authority for the new ID system and will implement Countywide standards after completion of the Courthouse Complex rollout. Using lessons learned from the Courthouse campus implementation, Facilities Management will develop and apply consistent requirements across other County card issuing locations, including a controlled process for approving and issuing system credentials for staff who require access to the ID system to perform their job duties. This work is anticipated to be completed by the end of the third quarter of 2026.

Recommendation #8	
Recommendation – December 2025 *Facilities should develop general policies and procedures for Employee ID issuance that align with best practices and distribute to all relevant department personnel within six months of full implementation of the new system at the Courthouse Complex. In addition, a set schedule for periodic review of potential updates should be established.*	
Deadlines Established Y/N?	Y
Date	**Management Comments:**
Current – June 2026	DAS – Facilities Management Division Update: This recommendation remains in progress. FMD Security has developed SOPs to support the County ID and access badge process within the CCURE environment. These SOPs establish standard expectations for credential issuance, access approvals, access modifications, replacement credentials, access removal, audits, temporary access, contractor access, and record retention. Because County IDs and access badges are being combined into the same credential, the employee ID issuance process will continue to be refined as the Courthouse Complex conversion is completed and the remaining CCURE technology is finalized. Once the remaining technology is installed, configured, and validated, FMD Security will update the SOPs to include the finalized employee ID issuance requirements. The finalized procedures will address photo requirements, required identifying information, display expectations at screening points, reporting and replacement of lost or stolen credentials, and how County IDs align with access permissions. FMD Security will distribute the procedures to relevant department personnel and authorized card issuing locations. A recurring review schedule will also be established so the guidance remains current as technology and operational needs change.

	Expected Completion: 1st Quarter 2027.
Audit Report Response – December 2025	Facilities Management will develop and issue standardized policies and procedures for employee ID issuance in the CCure environment, including photo requirements, required identifying information, expectations for displaying credentials at screening points, processes for reporting and replacing lost or stolen cards, and how IDs align with access permissions. These procedures will be distributed to all relevant department personnel and other authorized card issuing locations, and Facilities will establish a recurring review schedule to ensure the guidance remains current as processes and technology continue to mature. This work will be completed within six months of full implementation of the new system at the Courthouse Complex.

Recommendation #9		
Recommendation – December 2025 *Facilities should evaluate if the policies and procedures should be developed into an AMOP.* Also see Recommendation 8 of Courthouse Access Status Report.		
Deadlines Established Y/N?		Y
Date	**Management Comments:**	
Current – June 2026	DAS – Facilities Management Division Update: This recommendation remains in progress. FMD Security has developed SOPs to support the County ID and access badge process within the CCURE environment. These SOPs are intended to establish the initial operating framework for credential issuance, access approvals, access modifications, access removal, audits, replacement credentials, temporary access, contractor access, and record retention. Once the Courthouse Complex conversion is complete and the appropriate technologies are finalized and configured in CCURE, FMD Security will evaluate whether the finalized SOPs should be developed into an AMOP. This evaluation will focus on whether the process should be formalized at the Countywide level to ensure consistent direction for County IDs, access badges, credential returns, deactivation, card issuing locations, and related security controls. FMD Security will coordinate with the appropriate County partners as part of this evaluation to determine the proper format, scope, and approval path for any AMOP related to the County ID and access badge process. Expected Completion: 1st Quarter 2027.	

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Audit Report Response – December 2025	As Facilities Management completes and distributes the employee ID issuance policies and procedures for the Courthouse Complex, Facilities Management will evaluate whether the finalized requirements should be formalized as an Administrative Manual of Operating Procedures entry to ensure consistent Countywide adoption and long term governance. This evaluation will be completed within six months of full implementation of the new system at the Courthouse Complex.

Recommendation #10	
Recommendation – December 2025 *Six months after the process to issue non-County employee IDs is finalized, Facilities should issue policies and procedures that address the concern for accuracy of data entered into the new system, the ability to deactivate IDs in a timely manner, and providing for additional parameters for contractors as necessary.* Also see Recommendation 8 of Courthouse Access Status Report.	
Deadlines Established Y/N?	Y
Date	**Management Comments:**
Current – June 2026	DAS – Facilities Management Division Update: This recommendation remains in progress. FMD Security is continuing to develop the process for non-County employee IDs within the CCURE environment. This includes contractors, vendors, temporary staff, interns, State employees, and other non-County partner agency personnel who require County ID or access badge credentials. FMD Security's current SOPs address this process on an interim basis while the Courthouse Complex conversion continues and the remaining CCURE technology is finalized. The interim SOPs establish initial expectations for access requests, approvals, credential issuance, access modifications, access removal, temporary access, contractor access, audits, and record retention. These controls provide an operating framework until the final non-County employee ID process is completed. Because non-County employee records are not populated through Dayforce in the same manner as County employee records, FMD Security will establish finalized procedures to address data accuracy, required identifying information, responsible department approval, credential expiration, access removal, and timely deactivation. These procedures will also address additional contractor controls

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	where necessary, including documentation requirements, access duration, and department confirmation before access is extended. Once the Courthouse Complex conversion is complete and the appropriate technologies are finalized and configured in CCURE, FMD Security will update its SOPs to include the finalized non-County employee ID process. The finalized process will be distributed to relevant department personnel and authorized card issuing locations to support consistent credential issuance, modification, and deactivation. Expected Completion: 1st Quarter 2027.
Audit Report Response – December 2025	Facilities Management will finalize the process for issuing non County employee IDs and, within six months of that process being finalized, will issue written policies and procedures that establish clear requirements for data entry standards, timely deactivation expectations, and additional controls for contractors where needed.

Newly Closed Recommendations

Recommendation #1	
Recommendation – December 2025 *The Sheriff's Office should include additional direction in its policies or training materials for the screening stations to alert PSOs to review physical attributes of the person presenting the ID to match the ID. Mandatory refresher training should be held for PSOs to align with best practices.*	
Deadlines Established Y/N?	
Date	**Management Comments:**
Current – June 2026	Office of the Sheriff Update: Milwaukee County Sheriff's Office policy 1103, titled Public Safety Officers (PSO), was updated and posted on 02/12/26. Included in the updated policy is language that states, "Verifying physical attributes of the person presenting the ID should match the ID", as a key responsibility. Additionally, in the training section of the policy, annual training was mandated to include the following topics: Illegal security / screening station bypass, ID verification, Screening station bypass by authorized personnel, and ID status expiration date and/or de-activated (ex-employee) status. Training for 2026 has already been completed (06/10/26). We have fully complied with this recommendation.

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Audit Report Response – December 2025	Office of the Sheriff: Although our policy does state under PSO responsibilities that they are to, “Verify employee or professional credentials for a person gaining entry” and that they are to “Make sure that the picture on the identification card is that of the person presenting the identification card”, we agree that adding language related to reviewing physical attributes could be beneficial. We will update our policy and add that language accordingly. Additionally, our training forms already include language advising our officers to request a second form of ID if the picture is faded and instruct the employee to get a new one. There are also instructions to seize the ID card if it does not belong to the person presenting it, or if it is expired. We intend on implementing mandatory refresher training on ID checks in 2026. This requirement will be added to our policy document. DAS – Facilities Management Division: Facilities Management recognizes that the Sheriff’s Office is responsible for public safety officer policies, post orders, and training materials related to screening operations. Facilities Management will support the Sheriff’s Office as requested, including coordination on how the new entrance validation solution will be used operationally to strengthen ID verification at staff entry points. This solution will be implemented in the first quarter of 2026 and is expected to reduce reliance on small credential photos by displaying credential information and an enlarged photo for review at the point of entry.

Recommendation #2	
Recommendation – December 2025 *The Sheriff’s Office should establish a policy and procedures for conducting periodic unannounced testing of the PSO screening stations.*	
Deadlines Established Y/N?	
Date	**Management Comments:**
Current – June 2026	Office of the Sheriff Update: Milwaukee County Sheriff’s Office policy 1103, titled Public Safety Officers (PSO), was updated and posted on 02/12/26. Included in the updated policy under “Supervisor Responsibilities”, is a mandate to establish testing procedures for the confirmation of successful screening procedures. The testing shall be conducted on a semi-annual basis (at the least). The testing will include: ID verification checks (covering/obscuring their photo ID badge, using another staff’s valid ID, and/or not clearly displaying their ID), and contraband detection. The first round of testing has already been conducted (06/09/26). We have fully complied with this recommendation.

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Audit Report Response – December 2025	Office of the Sheriff: As recommended, we will implement annual testing or "Integrity Checks" in 2026 as well. This requirement will be added to our policy document. DAS – Facilities Management Division: Facilities Management recognizes that periodic unannounced testing of screening stations is operationally managed by the Sheriff's Office. Facilities Management will support these efforts as requested, including assisting with coordination and use of the new entrance validation solution as an added control point that confirms credential status at entry. The entrance validation solution is scheduled for implementation in the first quarter of 2026.

Recommendation #11	
Recommendation – December 2025 *Facilities should develop policies and procedures for background checks for contractor IDs prior to issuance of IDs. In addition, a policy to ensure the background checks are conducted annually for any contractors with after-hours access should be created. These should be completed within six months of the full implementation of the new system at the Courthouse Complex.* Also see Recommendations 9 and 10 of Courthouse Access Status Report.	
Deadlines Established Y/N?	
Date	**Management Comments:**
Current – June 2026	DAS – Facilities Management Division Update: This recommendation has been completed. FMD Security has established a formal contractor background check process for contractor IDs and access badges. This process went live in June 2026 and will be used as the required documentation to verify that contractors have completed the appropriate background check before credentials are issued. Under this process, FMD Security controls the contractor background check workflow and maintains documentation supporting the review. Contractor access requests must be tied to a responsible County department or designated County representative, and FMD Security will not issue a contractor ID or access badge until the required background check documentation has been completed and verified.

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	FMD Security will also notify responsible departments when their contractors are required to complete a background check or annual background check validation. This includes contractors who maintain ongoing access and contractors who require after hours access. These notifications will help ensure contractor access remains current, documented, and tied to an approved operational need. This process addresses the requirement for background check verification prior to contractor ID issuance and establishes an ongoing validation process for contractors with after-hours access. Expected Completion: Complete.
Audit Report Response – December 2025	Facilities Management will update contractor badging procedures to ensure background check documentation is verified prior to issuance and to require an annual background check validation for contractors who maintain ongoing access, particularly for those requiring after-hours access. This work will be completed within six months of full implementation of the new system and will be coordinated with the appropriate County partners to ensure the standard is enforceable and consistently applied.

<u>Previously Closed Recommendations</u>

None