



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

August 2024



In 2023, a County manager found an active keycard in the desk of an employee who separated in 2017 and a second manager had six active access keycards from former employees.



**Our review of the keycard data found 260 duplicate active keycards with some individuals having multiple duplicates.**

Facilities provided us with a list of all active keycards for the Courthouse Complex which had 3,415 ID numbers and 3,675 key card numbers which meant there were 260 duplicate active keycards. Of those duplicates 179 users had one duplicate card while 37 users had more than one duplicate keycard. There were seven instances where a person had four active duplicate keycards.

**Summary of Key Data Elements in the Keycard Access Data File**

<b>Item</b>	<b>Definition</b>	<b>Data Set Amount</b>
<b>Individual ID</b>	Number created within the system to correspond to the owner of the keycard or key.	3,415
<b>Keycard No.</b>	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

Portions of Facilities’ procedures discuss issuance of duplicate keycards, however, they do not address the cancellation of the keycard that is being replaced. Facilities is not consistently cancelling existing keycards when a duplicate keycard is issued.

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.

**We compared the list of active keycards provided by Facilities to the active employee list from the County's payroll system. We successfully paired 1,478 keycards. 1,937 keycards remained without a match.**

The 1,937 unmatched keycards are due in part to the following errors and issues we noted in the data in the keycard system:

- Misspelling of names
- The use of nicknames on the handwritten facilities keycard request form
- Name changes that were updated in the payroll system but not in Facilities keycard system
- State employees who should have keycard access such as Public Defenders, District Attorneys and Judges
- Appointees who serve on various boards who are not County employees
- Keycards not deactivated when users terminate

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 selecting and performing additional testing on selected keycards, there were 1,538 unmatched keycards remaining.**

We selected some keycards for additional review due to:


- the level of risk to the County
- the appropriateness of the keycard within the permanent system
- Identifiers with the access point such as “DA” or Public Defender”
- Names found on published lists of Circuit, Appellate and Wisconsin Supreme Court Judges and Justices
- Access points and names that indicated the cardholder was a contractor

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

**The use of a handwritten form that allows employees to list their name rather than require the use of legal names, the keying of the information into the database, the lack of identifiers for non-employee cardholders and the lack of the inclusion of the County's employee ID number were identified as hindrance to management monitoring of the card database.**

The handwritten form for keycards is keyed into Facilities' database.

The County's payroll system generates a unique six-digit employee number for every employee which is not currently used by Facilities nor were there identifiers for non-county keycard holders.



**AUTHORIZATION FOR ISSUANCE OF KEYS AND ACCESS CARDS**

**NAME OF EMPLOYEE:** [REDACTED]

**DEPARTMENT NAME AND ORGANIZATION NUMBER:** [REDACTED]

**EMPLOYEE'S LOCATION (room number and building):** [REDACTED]

**EMPLOYEE'S DEPARTMENTS CONTACT NUMBER:** [REDACTED]




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.

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.

**Facilities has written policies and procedures with detailed issuance guidelines, but they lack the same level of detail for guidelines when employees or other authorized users separate.**

Human Resources issued Employee Separation Checklist 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.

Facilities' AMOP and Procedures Manual include language regarding notification regarding terminations but a review testing keycards is not currently being conducted.

				<b>Administrative Manual of Operating Procedures</b>			
Procedure #: <b>02.03.07</b>		Procedure Title: <b>Discharge of a Classified Employee</b>			Revision #: <b>2.1</b>		
Original Issue Date:		Revised Issue Date:		Next Review Date:		Responsible Department: <b>Human Resources</b>	
							Ordinance References: <b>MCO Chapter 33 &amp; Civil Service Rules I, II, VII</b>
							Forms: <a href="#">Form 02.03.07(a) - Written Charges Against Civil Service Employees</a> <a href="#">Form 02.03.07(b) - Employee Separation Checklist</a>
							
				<b>Administrative Manual of Operating Procedures</b>			
Procedure #: <b>14.02</b>		Procedure Title: <b>Employee Access Card and Key Issuance and Return</b>			Revision #: <b>1.0</b>		
Original Issue Date: <b>4/20/2023</b>		Revised Issue Date: <b>N/A</b>		Next Review Date: <b>4/20/2025</b>		Responsible Department: <b>DAS - Facilities Management – Operations &amp; Maintenance</b>	

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.**

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.

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 for State employees of the DA and the Public Defender that should no longer be active which is 44% of all current keycards for those departments.**

Based upon access codes we sent 457 keycards to the DA and Public Defender for review. After that review 199 were flagged to be deactivated. We reviewed and cleared 81 keycards for Judicial staff and elected officials from lists for the Circuit Court along with Appellate Court Judges and Supreme Court Justices.

<b>Count by Category of Permanent Keycards with No Matching County Employee</b>			
<b>Category</b>	<b>Keycards with No County Employee Match</b>	<b>Keycards Cleared After Testing</b>	<b>Remaining Keycards</b>
<b>District Attorneys</b>	320	185	135
<b>Public Defenders</b>	137	73	64
<b>Judges, Court Comm. and Court Staff</b>	81	81	0
<b>Total</b>	538	339	199

The unique situation at the County has the need for State employees to have permanent access keycards and the AMOP and policies and procedures do not directly address the termination of State employees. Facilities does not have easy access to confirm which keycards should be terminated.

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 are supposed to only be issued temporary keycards, but we found contractors keycards within the permanent keycard database.**

- The AMOP and the Procedures Manual state that contractors should only be issued a temporary keycard from Facilities.
- We found 169 keycards within the data set of permanent keycards.
- Of the 169 contractor keycards, 105 keycards were for WCS under contract with the Chief Judge's Office. That office reviewed and found that 36 keycards should no longer be active.
- 39 of the permanent keycards 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.
- 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.

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.

**From our review, sunsetting of temporary cards at year end appears to follow Facilities’ policies. We found four contractor keycards within the temporary file with no 2024 payment activity.**

- Cards issued within the temporary file are to sunset at year end including those cards 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 temporary keycards 67 were marked as being issued to contractors.
- Our review found that 54 of those cards had no issues, nine were untestable due to misspellings or acronyms and four had no payments in 2024.

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

## **Facilities was unable to provide a current properly signed agreement with Kain Energy Corporation.**

- Facilities followed the Milwaukee County Ordinance for public works contracts using the rules for Time and Material contracts for its contract with Kain Energy Corporation.
- A contract signed in 2018 had extension options that expired in 2021.
- 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.
- The current Facilities departmental procedure does not clarify additional reasoning for extending contracts beyond three years or price increases nor is there any specification included regarding what documentation should be retained.

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.

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