

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE CHIEF FINANCIAL OFFICER**

**AUDIT OF THE OFFICE OF FINANCE AND
TREASURY'S CASHIERING OPERATIONS AT
ST. ELIZABETH'S HOSPITAL, VITAL RECORDS, AND
THE RHODE ISLAND AVENUE DMV**

OFFICE OF INTEGRITY AND OVERSIGHT



GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Chief Financial Officer



MEMORANDUM

TO: Jeffrey Barnette, Deputy Chief Financial Officer and Treasurer
Office of Finance and Treasury

FROM: Mohamad K. Yusuff, Interim Executive Director,
Office of Integrity and Oversight

DATE: September 19, 2013

SUBJECT: Final Report on the Audit of the Office of Finance and Treasury's Cashiering Operations at St. Elizabeth's Hospital, Vital Records and the Rhode Island Avenue Department of Motor Vehicles (**Report No. 13-01-11 OFT**)

This report summarizes the results of the Office of Integrity and Oversight's (OIO) Audit of Cashiering Operations at three sites of the Office of Finance and Treasury (OFT): St. Elizabeth's Hospital, Vital Records, and the Rhode Island Avenue Department of Motor Vehicles. The overall objectives of the audit were to: 1) assess whether OFT complied with the applicable laws, regulations and internal policies and procedures; 2) determine whether OFT established internal controls to adequately safeguard assets from fraud, waste, and abuse; and 3) verify whether OFT adequately monitored cashiering operations.

OIO provided three recommendations to address the findings cited in the report. OFT, in general, concurred with the recommendations and has proceeded to implement them. We consider OFT's actions as fully responsive to our recommendations. The full text of the Office of Finance and Treasury's response is included as Appendix 1.

We appreciate the assistance and cooperation that you and your staff provided to OIO during this audit. Should you have any questions or need additional information, please contact me at (202) 442-6433, or Tiong The, Audit Manager, at (202) 442-8294.

Attachments

cc: Kathy Crader, Chief Risk Officer, OCFO
Clarice Wood, Associate Treasurer, Banking and Operations, OFT

**AUDIT OF THE OFT'S CASHIERING OPERATIONS AT ST. ELIZABETH'S
HOSPITAL, VITAL RECORDS AND THE RHODE ISLAND AVENUE DMV**

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**AUDIT OF THE OFT'S CASHIERING OPERATIONS AT ST. ELIZABETH'S
HOSPITAL, VITAL RECORDS AND THE RHODE ISLAND DEPARTMENT OF
MOTOR VEHICLES**

ACRONYMS AND TERMS

DHS	Department of Human Services
DMH	Department of Mental Health
DMV	Department of Motor Vehicles
DOH	Department of Health
GAO	Government Accountability Office
OFT	Office of Finance and Treasury
OIO	Office of Integrity and Oversight
RDC	Remote Deposit Capture
RI-DMV	Rhode Island Avenue Department of Motor Vehicles
SS	Social Security
SSI	Supplemental Security Income
VA	US Department of Veteran Affairs
VR	Vital Records

EXECUTIVE SUMMARY

OVERVIEW

The Office of Integrity and Oversight (OIO) has completed the audit of the Office of Finance and Treasury's (OFT) Cashiering Operations at the St. Elizabeth's Hospital, Vital Records and Rhode Island Avenue Department of Motor Vehicles (RI-DMV). Our overall objectives of the audit were to assess whether OFT complied with the applicable laws, regulations and internal policies and procedures; to determine whether OFT established internal controls to adequately safeguard assets from fraud, waste, and abuse; and to verify whether OFT adequately monitored cashiering operations.

On April 25, 29, and 30, 2013, the OIO auditors accompanied by the OFT's representative, made surprise visits to the three OFT's cashiering sites respectively identified above, to review their cash handling operations. We performed an assessment of the cashiering locations, and evaluated the internal controls used for their daily operations. During the visits, we performed cash counts; observed and examined security features at these locations; interviewed staffs to understand their procedures for securing receipts for deposits; and reviewed current cash policies and procedures.

CONCLUSION

We visited all the three OFT's cashiering locations and found that their cash handling processes were generally effective and efficient. There were no cash deficiencies noted. However, our audit disclosed:

1. That the cashiering supervisor is performing data entries to the QuickBooks Accounting System for hospital checks and funds received for disbursements to the patients without generating a monthly or quarterly reports for the Hospital's or the OFT manager's review and approval.
2. Checks that have been remotely deposited are not being shredded on a timely basis at the Vital Records and RI-DMV. Remotely deposited checks were held for more than the 21 days as required by the OFT's policy.
3. Untimely deposits of cash receipt's due to miscommunication and errors in recording deposits in the Armored Services Log Book at the RI-DMV.

OTHER MATTERS OF INTEREST

During our visit to the three OFT cashiering locations, we noted the following observations over the physical security of the sites:

EXECUTIVE SUMMARY

- St Elizabeth's Hospital: We noted that plastic bags containing patient's personal valuables were loosely stored on the vault's bottom drawer. We expressed concern about the vulnerability of the valuables being mislaid and/or unaccounted for.
- Vital Records: We interviewed and noted that the Cashier Supervisor was unable to recall whether the fire hazard water sprinklers, the safety panic button and the surveillance cameras are working.
- Rhode Island Avenue Department of Motor Vehicles: We found that the Vault Room Door which is also the Cashier Supervisor's office does not have a Door Peep Hole Viewer necessary to identify any intruder.

SUMMARY OF RECOMMENDATIONS

This report contains three recommendations to address the deficiencies identified during the audit. The recommendations are directed to the Associate Treasurer for Banking and Operations, OFT and focus on:

- Putting adequate internal control in place by the St. Elizabeth's management and the OFT so that the recording and the distribution of funds are being properly recorded and monitored.
- Destroying the Remote Deposit Capture (RDC) checks immediately after the 21 days moratorium as required by the OFT policies.
- Ensuring that its daily receipts are deposited in a timely manner. In addition, improving the effectiveness and control of its cash receipts recording in the armored log book.

A summary of the potential benefit resulting from this audit is shown as Exhibit A.

MANAGEMENT RESPONSE AND OIO COMMENTS

OIO received a written response from the Associate Treasurer of the OFT on September 11, 2013, which generally agreed with our findings and recommendations. OFT has taken, or is in the process of taking, certain corrective actions to address the noted issues. We consider OFT's corrective actions to be responsive to our recommendations. The full text of OFT's response is included in Appendix 1.

INTRODUCTION

BACKGROUND

The St. Elizabeth's Hospital is a psychiatric hospital operated by the District of Columbia Department of Mental Health. Its Cashiering operation is unique in that it is not open to the public for point of sale revenue collections and it's under the purview of the OFT. Many patients at the St. Elizabeth's are eligible for financial benefits which can be received while hospitalized, and some patients have private funds available. Benefit funds are available in the form of Supplemental Security Income (SSI), Social Security, Veteran Affairs (VA) benefits, Railroad Retirement benefits, Civil Service benefits, private insurance programs and other similar resources. In addition, patients may receive funds from family members, while other patients are permitted to hold jobs. The hospital, through its Benefits Coordinator, assists all patients in applying for available benefits. The Cashier maintains daily, and all transactions in QuickBooks indicating receipts and disbursements for every patient with an account.

Vital Records is responsible for collecting, preserving and administering the District's system of birth and death records through the OFT cashiers. The daily receipts consist of collections from sales of birth and death certificates, termination and declaration of domestic partnership and birth and death certificates correction. Collection receipts include cash, checks or credit cards and process through OFT's iNovah cashiering system.

The Rhode Island Avenue Department of Motor Vehicle is a full-service center and the Office of Finance and Treasury (OFT) provides over-the-counter payment collection services to District Tax payers. The OFT also operates several of these service centers throughout the District where funds are collected daily. The daily collection of receipts consists of all taxes, license permit fees, fines, forfeitures, refunds and other fees, charges, and miscellaneous revenue collected by the District Government from the public, the federal government, the courts or any agency within the District Government.

OBJECTIVES, SCOPE, AND METHODOLOGY

Our audit objectives were to: (1) Assess whether OFT complied with the applicable laws, regulations and internal policies and procedures; (2) Determine whether OFT established internal controls to adequately safeguard assets from fraud, waste, and abuse; and (3) Verify whether OFT adequately monitored cashiering operations. Our audit scope was to examine the cash functions and other records of the Office of Finance and Treasury. Our audits examined the cash handling processes covering the period October 1, 2012 through April 30, 2013.

To accomplish our objectives, we performed surprise cash counts at the cashiering sites of the St. Elizabeth's Hospital, Vital Records, and the RI-DMV on April 25, 29, and 30, 2013 respectively. We obtained an understanding of the internal control structures for the three site's cash functions. We also reviewed applicable legislation, administrative rules and OFT's Cashiering Procedures Manual. Our surprise cash counts included physical observations of the operations

INTRODUCTION

and security at the above mentioned locations. We tested the documentation supporting various cash transactions processed on those dates and interviewed the cashier personnel. Additionally, we took the inventory of the patient's personal property secured in the Vault and compared to the attached list. We also tested the iNovah Quarterly User Security Configuration report to ensure that terminated employees have been deactivated from the system. Our examination revealed no discrepancies.

We relied on computer-processed data contained in the OFT's financial and Central Cashiering – iNovah System. We did not perform a formal reliability assessment of the data contained in the iNovah System because the System's reliability tests were performed previously as part of the audit of the Comprehensive Annual Financial Report.

We conducted this performance audit in accordance with generally accepted government auditing standards issued by the Comptroller General of the United States. 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.

FINDINGS AND RECOMMENDATIONS

FINDING 1: INTERNAL CONTROLS OVER THE RECORDING OF FUNDS RECEIVED AND DISBURSED
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SYNOPSIS

We noted that the cashiering supervisor at the St. Elizabeth's Hospital is performing data entries to the QuickBooks Accounting System for hospital checks and funds received for disbursements to the patients. There is no monthly or quarterly reports generated for the hospital's or the OFT's manager's review and approval. As a result of this lack of supervisory review, waste and abuse could occur.

The St. Elizabeth's Cashiering office was assumed in November 2012, and internal controls are still being put in place by the OFT and the Hospital managements. The recording of these receipts and disbursements of funds are not properly segregated and are not being reviewed by the Hospital and OFT.

DISCUSSION

Many patients at the St. Elizabeth's Hospital are eligible for financial benefits which can be received while hospitalized, and some patients have private funds available. Benefit funds are available in the form of Supplemental Security Income (SSI), Social Security, Veteran Affairs (VA) benefits, Railroad Retirement benefits, Civil Service benefits, private insurance programs and other similar resources. In addition, patients may receive funds from family members, while other patients are permitted to hold jobs. The hospital, through its Benefits Coordinator, assists all patients in applying for available benefits. The Cashier enters all transactions in QuickBooks indicating receipts and disbursements for every patient with an account.

Our enquiries revealed that no periodic reports were generated from the QuickBooks for supervisory review and approval, either by the Hospital's or the OFT's manager.

The segregation of duties principle requires that the approval function, the accounting function/reconciling function, and the asset custody function should be separated among employees. When these functions cannot be separated adequately, a detailed supervisory review of related activities is required as a compensating control activity.

RECOMMENDATION

1. We recommend the Deputy Chief Financial Officer and Treasurer, OFT, in conjunction with the Hospital Management, should establish proper internal control procedures at the hospital so that the recording and the distribution of funds are being properly recorded and monitored.

FINDINGS AND RECOMMENDATIONS

AGENCY RESPONSE

OFT's management stated the hospital's accounting department purchased the QuickBooks general ledger system for the OFT cashiers to record the activity of each patient's funds. Hospital management has designated the social worker supervisor, to receive a monthly report from the QuickBooks system listing each patient's account balance and property held by OFT. It is agreed that an additional level of review from hospital staff monthly of the patients account balance and property is warranted as an additional control activity. OFT will also include a review of the report in its monthly and quarterly audit procedures.

OIO COMMENT

OFT and the Hospital Management's corrective actions are responsive to our recommendation.

FINDINGS AND RECOMMENDATIONS

FINDING 2: TIMELY SHREDDING OF REMOTELY DEPOSITED CHECKS AT THE OFT'S CASHIERING SITES

SYNOPSIS

OFT did not fully comply with its policy on Remotely Deposited Capture (RDC) Checks. During our walkthrough of the vault located in Vital Records and the Rhode Island Avenue Department of Motor Vehicles, we noted some checks were stored and bound together in batches. Our inquiries revealed that these RDC checks are waiting to be shredded.

This condition occurred because OFT management did not adequately reinforce RDC procedures to its employees.

This weakness creates a risk that the same checks could be resubmitted either by accident or by design, which could result in fraudulent activities.

DISCUSSION

RDC checks were held beyond the 21 days required in the addendum to the OFT's Cashiering Operations Manual. We observed on April 29, 2013, that at the Vital Records Cashiering Vault, there were batches of RDC checks from January 11, 2013, (well over the 21 days hold limit) were still bound together in batches and stored in the vault instead of being shredded. We also noted on April 30, 2013, at the RI-DMV Cashiering Vault, there were still batches of RDC checks (April 5, 2013 in-takes) that were over the 21 days hold limit, bound together in batches and stored in the vault awaiting shredding.

The OFT's Addendum to its Cashiering Operations Manual, stated, "checks that have been successfully captured must be shredded in-house physically after 21 business days. This must be done with **dual** control to ensure checks are being properly disposed of".

Remote Deposit Captured "RDC" checks are held for over three months without being mutilated. Therefore, if not properly monitored, there is a possibility that these un-shredded checks could be resubmitted.

RECOMMENDATION

2. We recommend that OFT's Senior Management enforce compliance of RDC's procedures to shred such checks in accordance with OFT's policies and procedures.

FINDINGS AND RECOMMENDATIONS

AGENCY RESPONSE

OFT concurred with the recommendation and stated that each cashiering site needs to be monitored closer for adherence to the RDC procedure for shredding checks after the image file is transmitted to the Bank. As part of the monthly and quarterly audit by OFT management this will be checked for compliance.

OIO COMMENT

OFT's corrective actions are responsive and meet the intent of our recommendation.

FINDINGS AND RECOMMENDATIONS

FINDING 3: DAILY CASH RECEIPT'S RECORDING AND DEPOSITS

SYNOPSIS

We found that there were untimely deposits of cash receipts at the RI-DMV due to miscommunication and error in recording deposits in the Armored Services log book.

The new Cashier Supervisor was not informed that Garda Services was to pick up the deposits to Citibank instead of Dunbar to Wells Fargo Bank on April 17, 2013. As a result of the miscommunication, the funds were not re-deposited to Citibank until May 1, 2013. In reviewing the Armored Delivery Services Log Book, we also noted recording errors in more than four instances.

DISCUSSION

The OFT's Cashiering Operations Manual, Section 20010601-1A.40, last updated: 07/12/12, requires, "The Senior Cashiers or Site Supervisors are responsible for the **daily and accurate deposit** of District receipts".

During our walkthrough of the vault located in RI DMV, we noted six clear plastic bags containing cash and cash equivalents from the previous day's receipts awaiting armored truck pick-up for deposit. Our inquiry revealed that four of the six bags were erroneously picked up by **Dunbar** instead of **Garda** and it took over thirteen days to restore the situation to normalcy. The remaining two bags were for the weekend receipts preceding our site visit on Tuesday because they are closed on Mondays. We also noted many errors in recording the daily receipts in the Armored Delivery Services Log Book due to the negligence of the recorder. These errors may cause inefficiencies in the banks/OFT processing the daily deposit receipts.

RI DMV did not deposit cash receipts in a timely manner due to miscommunication. As a result, failure to deposit cash receipts in a timely manner could mean lost of interest earned to the District.

RECOMMENDATION

3. We recommend that OFT's Senior Management assure that the Rhode Island Avenue Department of Motor Vehicle cashiering operation ensure the daily and accurate deposits of District receipts in a timely manner. We also recommend that OFT take positive steps to improve the effectiveness and control of its cash receipts recording in the Log Book.

FINDINGS AND RECOMMENDATIONS

AGENCY RESPONSE

OFT's management stated that the Cashier Operations Supervisor established a procedure to clearly reflect each deposit type to ensure that all deposits were accounted for and properly credited to the correct DMV account.

OIO COMMENT

OFT's corrective actions are responsive to our recommendations.

OTHER MATTERS OF INTEREST

ST. ELIZABETH'S HOSPITAL

We noted during our visit, that plastic bags containing patient's personal valuables were loosely stored on the vault's bottom drawer. There was an inventory list of these items but the plastic bags were not stored in an orderly manner.

OFT does not have any specific safe deposits Vault that can protect personal valuables left in their trust. As a result, items not properly secured may be prone to being mislaid and/or unaccounted for.

OFT RESPONSE

OFT's management stated that the patient's valuables are secured in a sealed bag, labeled with the patient's name, and secured in the vault. The OFT, in consultation with the Hospital's management, are in the process of procuring a vault with locked compartments.

OIO COMMENT

We consider OFT's response to be sufficient and reasonable.

VITAL RECORDS

We noted that the Cashier Supervisor was unable to recall whether the fire hazard water sprinklers, the safety panic button and the surveillance cameras were ever tested to ensure they are working as expected. We made three attempts by email and followed with telephone calls to relevant officer at DOH responsible for securing the site.

As a result, emergencies requiring the use all these safety features by the cashiers to avert any disaster could not be achieved because they are not sure if the fire hazard water sprinklers, the safety panic buttons and the surveillance cameras are working. Moreover, there are three cashier booths at this site, the middle booth is empty and it's the only one equipped with a panic button. In the event of an emergency, the two cashiers would have to scramble to the middle booth to use the button and this may proved to be too late.

OFT RESPONSE

OFT management stated that two additional panic buttons are in the process of being installed at the Vital Records location.

OIO COMMENT

We consider action taken by OFT's management to be sufficient.

OTHER MATTERS OF INTEREST

RHODE ISLAND AVENUE DEPARTMENT OF MOTOR VEHICLES

The Vault Room Door which is also the Cashier Supervisor's office, at this location does not have a Door Peep Hole Viewer necessary to identify any intruder. As a result, this deficiency does not provide an adequate protection for the OFT personnel in charge of the vault.

OFT RESPONSE

DMV installed a peep hole in the supervisor's office door. OFT will also purchase a video camera monitor to allow the staff to see who is requesting access prior to opening the door.

OIO COMMENT

We consider OFT's response to be adequate and reasonable.

Exhibit A: Summary of Potential Benefits Resulting from Audit

Recommendation Number	Recommendations	Amount and Type of Benefit	Agency Reported Estimated Completion Date	Status ¹
1	Establish adequate internal control over the recording of funds received and disbursed at the St. Elizabeth's cashiering site	Internal Control	December 2013	Open
2	OFT should endeavor to shred all RDC checks older than 21 days as prescribed in its policy	Internal Control	December 2013	Open
3	OFT should ensure the daily and accurate deposits of District receipts in a timely manner	Internal Control	Completed	Closed

¹ This column provides the status of the recommendation as of the report date. For final reports "Open" means management and the OIO are in agreement on the action to be taken, but the action is not complete. "Closed" means that management advised that the action taken needed to correct the condition is complete. If a completion date was not provided the date of management's response was used. "Unresolved" means that management has neither agreed to take the recommended action nor proposed satisfactory alternative actions to correct the condition.

APPENDIX 1: OFT MANAGEMENT'S RESPONSE

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE CHIEF FINANCIAL OFFICER



Office of Finance and Treasury

MEMORANDUM

TO: Mohamad K. Yusuff, Interim Executive Director,
Office of Integrity and Oversight (OIO)

FROM: Clarice Wood, Associate Treasurer,
Office of Finance and Treasury (OFT) *Clarice Wood*

DATE: September 11, 2013

SUBJECT: Office of Finance and Treasury's (OFT) Audit Response to Draft Report
For Cashier Operations at St. Elizabeth's Hospital, Vital Records, and Rhode
Island DMV – **Report No. 13-01-11 OFT**

This memo is in response to the OIO Draft Report of Audit Findings and Recommendations for the OCFO cashiering sites completed on April 25, 29, and 30, 2013. The audit draft report is dated August 27, 2013. Below please find the OFT response.

Recommendation 1: Internal Controls over the Recording of Funds Received and Disbursed

We recommend the Deputy CFO and Treasurer, OFT, in conjunction with Hospital Management, should establish proper internal control procedures at the hospital so that the recording and distribution of funds are being properly recorded and monitored.

OFT Response:

There are proper internal control procedures in place at St. Elizabeth's cashiering site for recording and monitoring patient funds. The hospital's accounting department purchased the QuickBooks general ledger system for the OFT cashiers to record the activity of each patient's funds. Hospital management has designated Ms. Maura Gaswirth, the social worker supervisor, to receive a monthly report from the QuickBooks system listing each patient's account balance and property held by OFT. It is agreed that an additional level of review from hospital staff monthly of the patients account balance and property is warranted as an additional control activity. OFT will also include a review of the report in its monthly and quarterly audit procedures.

Recommendation 2: Timely Shredding of Remotely Deposited Checks (RDC)

We recommend that the OFT's senior management enforce compliance of RDC's procedures to shred such checks in accordance with OFT's policies and procedures.

APPENDIX 1: OFT MANAGEMENT'S RESPONSE

OFT Response:

It is agreed that each cashiering site needs to be monitored closer for adherence to the RDC procedure for shredding checks after the image file is transmitted to the Bank. As part of the monthly and quarterly audit by OFT management this will be checked for compliance.

Recommendation 3: Daily Cash Receipt's Recording and Deposit

We recommend that OFT's senior management assure that the Rhode Island office of DMV ensure the daily and accurate deposit of District receipts in a timely manner. We also recommend that OFT take positive steps to improve the effectiveness and control of its cash receipts recording in the Log Book.

OFT Response:

The Rhode Island DMV location is depositing District receipts timely and accurately. At the time of the audit, this location was in its first month of operation. The armored courier mistakenly delivered the DMV deposits to Wells Fargo Bank instead of Citibank. Subsequently, the deposits were returned to the Rhode Island location, held for clarification by the courier, or re-routed to the correct Bank. Instructions to the courier were clarified. During that time, the OFT cashiers utilized the courier log book to reflect returned deposits, redeployed deposits, and initial deposits that were not clearly labeled as such. The Cashier Operations Supervisor established a procedure to clearly reflect each deposit type, if such an event occurs again. All deposits were accounted for and properly credited to the correct DMV account.

Other Matters of Interest

- 1) St. Elizabeth's Hospital: Plastic Bags used to store patient valuables loosely stored on vault's bottom drawer. OFT does not have a safe deposit vault to secure these valuables and they may be prone to being mislaid and/or unaccounted for.

OFT Response:

The patient's valuables are secured in a sealed bag, labeled with the patient's name, and secured in the vault. A log is maintained and signed by both the OFT staff person receiving and the hospital staff person delivering the valuables. A copy of the form listing the patient's valuables is sealed in the bag and a copy is given to the hospital staff person delivering the valuables. The opportunity for mislaying or not accounting for the valuables is mitigated by this process. The bags are stored orderly in the bottom of the vault.

A vault with locked compartments for each patient's valuables was priced at \$15,000. As this is a customized vault required only for the hospital's purposes, the proposal was submitted to St. Elizabeth's hospital management for consideration of purchase.

- 2) Vital Records: Testing fire hazard water sprinklers, panic buttons, and surveillance cameras

OFT Response:

The monthly audit of each OFT site will now include the verification with staff and/or site logistics and support that scheduled testing was completed for each of these security systems. Two additional panic buttons are in the process of being installed at the Vital Records location.

APPENDIX 1: OFT MANAGEMENT'S RESPONSE

- 3) Rhode Island DMV: Supervisor's office which also houses the OFT vault needs a peep hole in door to identify persons prior to opening in case of intruder attempt.

OFT Response:

DMV installed a peep hole in the supervisor's office door. OFT will also purchase a video camera monitor to allow the staff to see who is requesting access prior to opening the door.

cc: Jeffrey Barnette
Donna McKenzie
Ingrid Richards