

CENTRAL FLORIDA EXPRESSWAY AUTHORITY

Agenda Central Florida Expressway Authority OPERATIONS COMMITTEE

April 18, 2016
10:30 a.m.
Sandpiper Conference Room 337

- A. **CALL TO ORDER** – *Steve Fussell, Operations Committee Chairman*
- B. **PUBLIC COMMENT**
Pursuant to Florida Statute 286.0114 (2013) the Operations Committee will allow public comment on any matter either identified on this meeting agenda as requiring action, or anticipated to come before the Committee for action in reasonable proximity to this meeting. Speakers shall be limited to three minutes per person and the assignment of one person's time to another or designation of group spokesperson shall be allowed at the discretion of the Committee Chairman.
- C. **APPROVAL OF JANUARY 25, 2016 MINUTES** – *Steve Fussell, Operations Committee Chairman*
(action item)
- D. **UPDATE ON S.R. 417 AND S.R. 429 BUY/SWAP** – *Laura Kelley, Executive Director* (info. item)
- E. **UPDATE ON CENTRALIZED CUSTOMER SERVICE SYSTEM (CCSS)** – *Laura Kelley, Executive Director*
(info. item)
- F. **UPDATE ON TOLL SYSTEM REPLACEMENT PROJECT** – *Joann Chizlett, Director of Special Projects*
(Info. Item)
- G. **UPDATE ON PAYTOLLO PHONE APPLICATION** – *Joann Chizlett, Director of Special Projects* (info. item)
- H. **OTHER BUSINESS**
- I. **ADJOURNMENT**

Section 286.0105, Florida Statutes states that if a person decides to appeal any decision made by a board, agency, or commission with respect to any matter considered at a meeting or hearing, he or she will need a record of the proceedings, and that, for such purpose, he or she may need to ensure that a verbatim record of the proceedings is made, which record includes the testimony and evidence upon which the appeal is to be based.

In accordance with the Americans with Disabilities Act (ADA), if any person with a disability as defined by the ADA needs special accommodation to participate in this proceeding, then not later than two (2) business days prior to the proceeding, he or she should contact the Central Florida Expressway Authority at 407-690-5000.

Persons who require translation services, which are provided at no cost, should contact CFX at (407) 690-5000 x5317 or by email at Iranetta.dennis@CFXway.com at least three business days prior to the event.

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**APPROVAL OF
JANUARY 25, 2016
MINUTES**

CENTRAL FLORIDA EXPRESSWAY AUTHORITY

MINUTES CENTRAL FLORIDA EXPRESSWAY AUTHORITY OPERATIONS COMMITTEE MEETING January 25, 2016

Committee Members Present:

Steve Fussell, Seminole County (Committee Chairman)
Beth Knight, Osceola County
Mark Massaro, Orange County
Charles Ramdatt, City of Orlando
Fred Schneider, Lake County

CFX Staff Present:

Laura Kelley, Executive Director
Lisa Lombard, Chief Financial Officer
Michelle Maikisch, Chief of Staff/Public Affairs Officer
Corey Quinn, Chief of Technology/Operations
Linda Brehmer Lanosa, Deputy General Counsel
David Wynne, Director of Toll Operations
Joann Chizlett, Director of Special Projects
Rene Rodrigue, Director of IT
Darleen Mazzillo, Recording Secretary/Executive Assistant

A. CALL TO ORDER

The meeting was called to order at 10:38 a.m. by Committee Chairman Steve Fussell.

B. PUBLIC COMMENT

There was no public comment.

The full agenda package is attached as Exhibit A, including items distributed at the meeting.

C. INTRODUCTION OF NEW COMMITTEE MEMBER, MARK MASSARO

Mr. Fussell welcomed and introduced new committee member Mark Massaro, Orange County Director of Public Works. Mr. Massaro replaces Jim Harrison on the committee.

D. APPROVAL OF OCTOBER 19, 2015 MINUTES

The October 19, 2015 minutes were presented for approval (Tab D of the agenda package).

A motion was made by Ms. Knight and seconded by Mr. Schneider to approve the October 19, 2015 Operations Committee minutes as presented. The motion carried unanimously with five members present and voting AYE by voice vote.

E. UPDATE ON S.R. 417 AND S.R. 429 BUY/SWAP

Executive Director Laura Kelley gave an update on discussions with FDOT regarding a buy or swap of portions of S.R. 417 and S.R. 429. (A system map showing the areas of the proposed buy/swap is located in Tab E of the agenda package.)

Ms. Kelley and Commissioner Carey have met with FDOT Secretary Jim Boxold over the past few months and, at the Governor's recommendation, have started discussions with Director of the Division of Bond Finance, Ben Watkins. Mr. Watkins and his staff are working on a valuation methodology to determine how much these assets are worth. Mr. Watkins has indicated that he hopes to be able to have a document we can work with by the end of January. We are in the process of scheduling a conference with FDOT staff for mid-February to discuss the valuation methodology.

(This item was presented for information only.)

F. UPDATE ON CENTRALIZED CUSTOMER SERVICE SYSTEM (CCSS)

Ms. Kelley passed out a letter received from Diane Gutierrez-Scaccetti, Executive Director/CEO of Florida's Turnpike Enterprise stating that they are ready to move forward with the development phase of the CCSS project now that FDOT has concluded the protest of the contract and have executed the contract with Xerox State and Local Solutions. (Backup materials are located in Tab F of the agenda package.)

Ms. Kelley explained that the master agreement from FDOT does not yet have the key elements that this Board expects to have. These key elements were reaffirmed at the January 14, 2016 Board meeting. She passed out a letter which was sent to Ms. Scaccetti outlining CFX's requirements for the Interlocal Agreement.

(This item was presented for information only.)

G. 2016 STRATEGIC PLANNING

Ms. Kelley explained that since the inception of E-PASS in 1994 our interoperability partners have not charged each other for transaction processing. In the Wekiva Parkway Interlocal Agreement we agreed for the first time to pay FDOT for the actual cost incurred by FDOT to process toll transactions in excess of the cost of toll transactions processed by CFX for FDOT. With the recent opening of the first section of Wekiva Parkway by FDOT, we have submitted a letter to FDOT requesting execution of an agreement outlining the transaction processing terms. (Backup materials located in Tab G of the agenda package.)

Ms. Kelley talked about the importance of E-PASS.

(This item was presented for information only.)

H. UPDATE ON TOLL SYSTEM REPLACEMENT PROJECT

Director of Special Projects Joann Chizlett gave a presentation on the Toll System Replacement Project (Tab H of the agenda package).

(This item was presented for information only.)

I. UPDATE ON TOLL PHONE APPLICATION

Ms. Chizlett gave an update on the PayTollo Project (Tab I of the agenda package).

(This item was presented for information only.)

J. UPDATE ON TRANSPONDER SWAP PROGRAM

David Wynne, Director of Toll Operations gave an update on the transponder swap program (Tab J of the agenda package).

(This item was presented for information only.)

K. UPDATE ON PAY-BY-PLATE

Mr. Wynne gave an update on the Pay-By-Plate program (Tab K of the agenda package).

(This item was presented for information only.)

L. FOLLOW-UP TO INTERNAL AUDIT REPORT – OPERATIONS ISSUES

Executive Director Laura Kelley referred to page 3 of the Prior Audit Recommendations Follow-Up Report and explained the details and status of the past due items. (Prior Audit Recommendations Follow-up Report is located in Tab L of the agenda package.)

(This item was presented for information only.)

M. OTHER BUSINESS

- Corey Quinn updated the committee regarding a previous committee suggestion to look into hiring a pool of traffic homicide investigators under the FHP contract to handle incidents on our system in the four county area. He reported that FHP has changed their rule and are now allowing us to hire a homicide investigator under our contract.
- Deputy General Counsel Linda Brehmer Lanosa reported that at the January Board meeting the Ethics Policy was revised to require committee members to file Financial Disclosure Form 1, effective July 1, 2016.
- Mr. Schneider mentioned a personal incident involving debris in the roadway and asked how motorists report roadway debris. The committee members suggested having prominent signs on the expressway showing the call *FHP information.
- Mr. Fussell reviewed some items from previous Board meetings:
 - The Board revised the Committee Charters to add citizen representatives.
 - In January Board discussion took place about the lack of video feeds for use by emergency service personnel. Mr. Fussell reported that Seminole County has put in a formal request to get better video access for EMS personnel. He suggested that other committee members also follow up with their respective counties. Ms. Kelley reported that CFX is drafting a letter to the Florida Turnpike regarding this issue.
 - At the January Board meeting an upgrade of the E-PASS call center was approved to handle the increased call volumes. It was also mentioned that a website redesign may reduce call volumes.

N. ADJOURNMENT

A motion was made by Mr. Ramdatt and seconded by Ms. Knight to adjourn the meeting at 11:55 a.m. The motion carried unanimously with all five members present and voting AYE by voice vote.

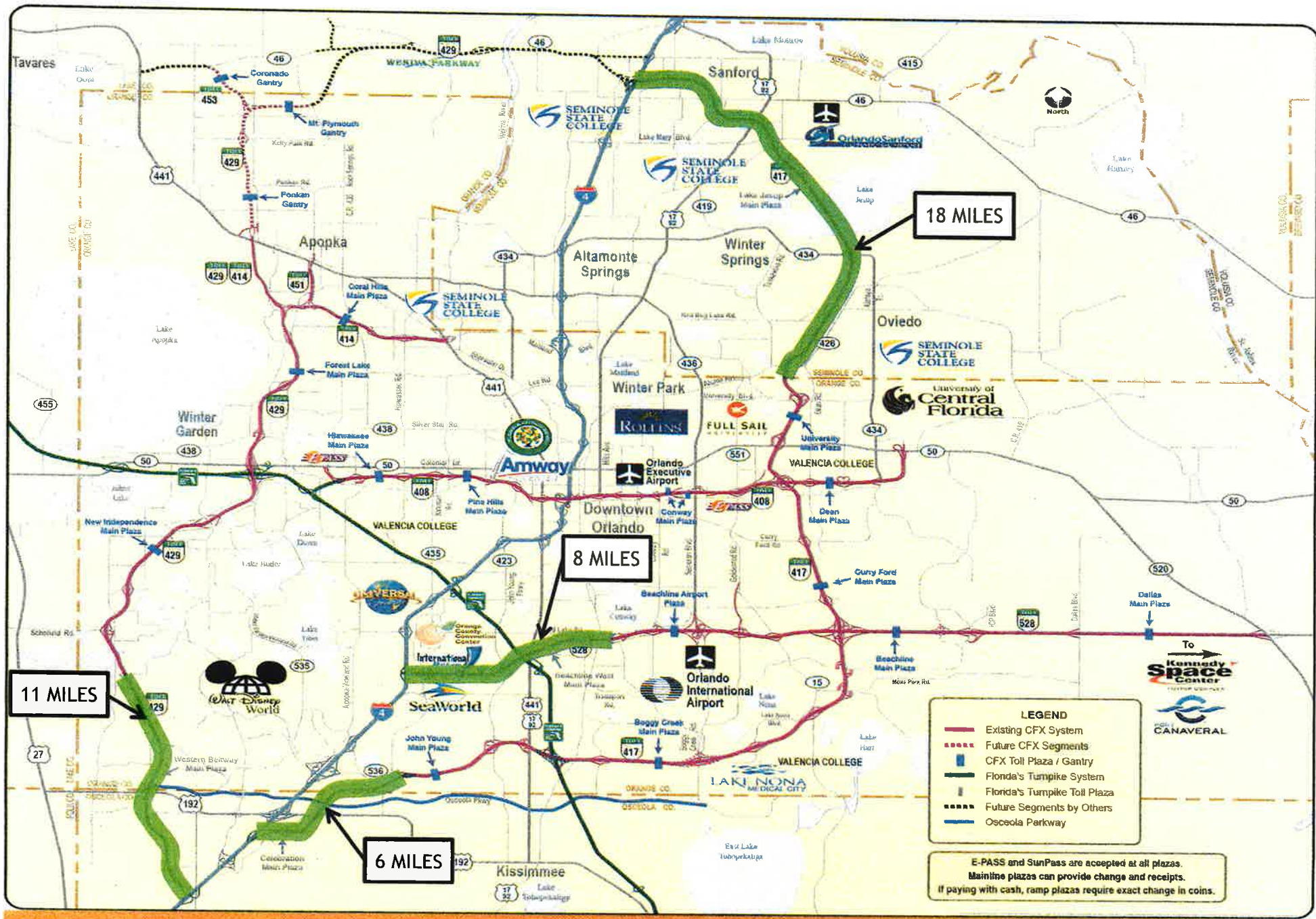
Minutes approved on _____, 2016.

Pursuant to the Florida Public Records Law and CFX Records Management Policy, audio tapes of all Board and applicable Committee meetings are maintained and available upon request to the Records Management Liaison Officer at publicrecords@CFXWay.com or 4974 ORL Tower Road, Orlando, FL 32807. Additionally, video tapes of Board meetings commencing July 25, 2012 are available on the CFX website, www.CFXway.com.

EXHIBIT "A"

E.

UPDATE ON S.R. 417
AND S.R. 429 BUY/SWAP



CENTRAL FLORIDA EXPRESSWAY AUTHORITY

F.
UPDATE CENTRALIZED
CUSTOMER SERVICE
SYSTEM (CCSS)



Florida Department of Transportation

RICK SCOTT
GOVERNOR

Florida's Turnpike Enterprise
P.O. Box 613069, Ocoee, FL 34761
407-532-3999

JIM BOXOLD
SECRETARY

December 9, 2015

Laura Kelley, Executive Director
Central Florida Expressway Authority
4974 ORL Tower Road
Orlando, FL 32807

Re: Centralized Customer Service System Contract ("CCSS")

Dear Executive Director Kelley:

I am pleased to advise you that the Florida Department of Transportation has concluded the protest of the referenced contract and executed same. Staff is moving forward with Xerox State and Local Solutions on the development phase of the project. As we move forward we would welcome your agency's participation in the process.

In order to speak with one voice to the vendor, Jack Henneman will be the project manager for implementation of the contract. Jack will be happy to visit with each agency separately to discuss the process. That said, if you would kindly identify a key individual that Jack can work with day-to-day to ensure that your agency's needs are being addressed and that appropriate members of your staff are at the table as necessary.

Enclosed is a copy of the executed contract as well as the Master Agreement. We look forward to a collaborative process that delivers a comprehensive CCSS solution with the common goal of providing one-stop customer service to our customers.

Sincerely,

Diane Gutierrez-Scaccetti
Executive Director and Chief Executive Officer

DGS/emd
enclosure

CENTRAL FLORIDA EXPRESSWAY AUTHORITY

January 21, 2016

Ms. Diane Gutierrez-Scaccetti
Executive Director and Chief Executive Officer
Florida's Turnpike Enterprise
P.O. Box 613069
Ocoee, Florida 34761

Subject: Centralized Customer Service System (CCSS) Interlocal Agreement

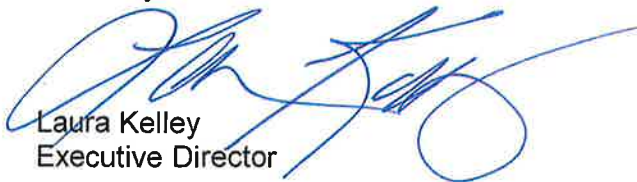
Dear Director Scaccetti,

We received your notification that Florida's Turnpike Enterprise has executed a CCSS contract with Xerox and is starting CCSS development. Time is critical, as an agreement between our agencies is required based on the executed Memorandum of Understanding (MOU) dated September 12, 2012. The MOU entered into on September 12, 2012 by Florida's Turnpike Enterprise, Miami-Dade Expressway Authority (MDX), Tampa-Hillsborough Expressway Authority (THEA) and Central Florida Expressway Authority's (CFX) predecessor, Orlando-Orange County Expressway Authority, stated that our four agencies would implement a Centralized Customer Service System (CCSS) through a jointly developed Interlocal Agreement (ILA) pursuant to Section 163.01, Florida Statutes.

According to the executed MOU, the ILA would include the requirements attached. In addition to the elements agreed to through the MOU, the Central Florida Expressway Authority has reaffirmed at its Board meeting on January 14, 2016 that at a minimum, the ILA should provide for a pro-rata share of ownership of the system, equal voice in management decisions, required key performance metrics and reasonable cost savings. As the Board reviews and considers the draft ILA, there could be additional elements recommended.

We look forward to working with you to develop this agreement in an expeditious manner and look forward to hearing from you in the near future.

Sincerely,



Laura Kelley
Executive Director

cc: CFX Board members
Jim Boxold, Secretary, FDOT
Florida Transportation Commission
Joe Waggoner, Executive Director, THEA
Javier Rodriguez, Executive Director, MDX

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**CCSS Interlocal Agreement Requirements
In accordance with the
Executed Memorandum of Understanding
Dated September 12, 2012**

1. Guidelines for development of a procurement document for the provision of CCSS services by a third party vendor, including system technology and data requirements;
2. The location of the centralized service center, disaster recovery and backup operations site(s), and regional walk-in customer service centers which support walk-up counter services, resolution of transaction discrepancies, and development of billable transactions and image reviews;
3. Interoperability between the CCSS and non-participants;
4. Interfaces with third parties such as parking facilities, rental car providers, fleet services and special customer requests;
5. Common business rules for customer account management, customer account types, and customer communications;
6. Common procedures for the issuance of unpaid toll notices, citations, and vehicle registration holds and releases;
7. Procedures to adopt or modify business rules related to functions of the CCSS. The Participating Agencies agree to work cooperatively to address and resolve any issues that may arise during the administration of the CCSS contract and to promptly address issues and effect written modification to the ILA as it from time to time may be required,
8. Procedures for protection of customer data;
9. Quality control processes and reporting requirements;
10. Data retrieval and reporting requirements;
11. A violation enforcement system that meets the requirements of all court jurisdictions;
12. Criteria for a common customer service center website;
13. Audit processes and reporting needs;
14. Administrative fees;
15. Collection criteria;
16. The use of collection agencies;
17. Maintenance of minimum account balances and handling of negative balances;
18. Allocation and distribution to each agency the toll transaction and violations revenues and fees for their roadways and the associated processes for allocation and distribution.
19. The disposition of interest earnings on prepaid toll accounts;
20. Identification of each agency's costs related to the operations and administration of the CCSS and the method of allocation and collection of those costs.

G.
2016 STRATEGIC
PLANNING



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Turnpike System as
part of the Florida
Department of
Transportation*

RICK SCOTT
Governor

ANANTH PRASAD, P.E.
Secretary of Transportation

DIANE GUTIERREZ-SCACCETTI
Executive Director and
Chief Executive Officer

Turnpike Headquarters:
Milepost 263, Bldg. 5315
Turkey Lake Service Plaza
Ocoee, FL 34761

Mailing Address:
P.O. Box 613069
Ocoee, FL 34761

Tel: 407.532.3999

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July 17, 2014

Laura Kelley
Deputy Executive Director
Central Florida Expressway Authority
4974 ORL Tower Road
Orlando, FL 32807

Subject: Fiscal Year 2015 Interoperable Transaction Processing Fees

Dear Ms. Kelley:

Florida's Turnpike Enterprise ("FTE" or "the Department") and Central Florida Expressway Authority ("CFX" or "the Authority") have a well-established partnership with regard to toll collection in Central Florida. Our agencies introduced transponder-based electronic toll collection (E-Pass and SunPass) many years ago, and both organizations have benefitted from the efficiencies gained from the growth of this method of toll collection.

In 2002, our agencies entered into the State of Florida Interagency Electronic Toll Collection Interoperability and Reciprocity Agreement (dated March 8, 2002 and as amended and supplemented from time to time) in order to establish the framework by which FTE processes SunPass customer transactions for the Authority, and the Authority processes E-Pass customer transactions for the Department. Our interoperability agreement allows customers the option of opening a SunPass account or an E-Pass account for electronic toll collection on either agencies' facilities. At the time the interoperability agreement was executed, payment for transaction processing (other than credit card fees) was not addressed as both parties believed that the transaction processing would maintain equilibrium (each agency processing roughly the same number of transactions for the other agency). However, in 2003, FTE began retail distribution of transponders, and SunPass customer accounts have grown substantially since then.

In the last decade, the annual volume of SunPass transactions for customers using the Authority's toll roads has been growing steadily. In 2004, FTE processed approximately 15 million more transactions for the Authority than it processed for FTE. Due to the unprecedented growth in SunPass customer accounts, in the last five years FTE processed an average of 72 million *more* interoperable transactions for CFX. This means that FTE bears the costs associated with customer account maintenance, customer support and back office infrastructure that is, in part, driven by customer activity associated with CFX facilities. CFX reports the transactions and revenues, but only bears the cost of the transactions it processes for E-Pass customers.



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At a meeting on August 1, 2013, the prior OOCEA's then Executive Director, Max Crumit, committed to Secretary Prasad that the Authority would pay transaction processing costs to FTE, and a review of each agency's costs was undertaken. Based on our analysis, we determined an interoperability fee of \$0.03 per transaction was appropriate. Included below is FTE's estimate for processing SunPass transactions on behalf of the Authority for Fiscal Year (FY) 2015. We projected the FY 2015 transaction count based on an annualization of the current processing volume for the first nine months of FY 2014. Note that over half of the Authority's annual electronic transaction volumes and the related customer support are handled by the FTE. This procedure is consistent with how other interoperable toll agencies within Florida are treated.

Please note that FTE intends to net the E-Pass transactions processed by the Authority on behalf of FTE against the SunPass transactions processed by FTE for the Authority. This provides for a net transaction figure to which the per-transaction fee is applied. The Department intends to implement this cost allocation structure effective July 1, 2014 (FY 2015) until such time as the statewide Centralized Customer Service System is implemented.

FY 2015 Estimated SunPass Transaction Costs

Projected transactions processed by FTE for CFX million	150
Projected transactions processed by CFX for FTE million)	(40
Net transaction estimate	90 million
Multiplied by a per-transaction fee of \$0.03	<u>\$.03</u>
Estimated charge to CFX for FY 2015	\$2.7 million

In terms of reimbursing the Department for the SunPass services provided to the Authority, such amount would be billed on a monthly basis (1/12th of the annual estimate each month, i.e. \$225,000) with a reconciliation performed after year-end once the final transaction counts have been determined. In the event that this 'true-up' process would result in a balance due or refund to the Authority, it would be settled at that time.

Note that credit card fees would continue to be deducted from the weekly revenue wires as they are today – there would be no change in the process for this charge.



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Please sign the acknowledgement line indicating agreement with the terms of this letter.

Sincerely,

Diane Gutierrez-Scaccetti
Executive Director and Chief Executive Officer

ACKNOWLEDGED AND AGREED TO:

Central Florida Expressway Authority

Date _____

Title

cc: Ananth Prasad, Secretary Florida Department of Transportation
Welton Cadwell, Chairman, Central Florida Expressway Authority

— CENTRAL FLORIDA EXPRESSWAY AUTHORITY

PRILL FORMER
STANDARD FORM 64

July 23, 2014

Via Certified Mail
Diane Gutierrez-Scaccetti
Executive Director and Chief Executive Officer
Florida's Turnpike Enterprise
P.O. Box 613069
Ocoee, Florida 34761

Re: Letter dated July 17, 2014, Regarding Fiscal Year 2015 Interoperable Transaction Processing Fees

Dear Ms. Scaccetti:

Thank you for your letter dated July 17, 2014 which we received on July 21. We very much appreciate the spirit of cooperation which has existed between our agencies during the previous 12 years that we have been operating under the currently effective Interagency Electronic Toll Collection Interoperability and Reciprocity Agreement (the "Interoperability Agreement"). We hope to continue our cooperative efforts for the mutual benefit of our respective customers for many years to come.

As you know from attending the inaugural governing board meeting of the Central Florida Expressway ("CFX") as our advisor, CFX is just beginning the process of assuming the operations of the former Orlando-Orange County Expressway Authority and its expressway system. Since receipt of your letter, our staff, general counsel, and external counsel have been working on this issue. Based on our preliminary analysis, it appears that the net transaction fees you have requested are a material departure from our existing cooperative arrangement in the Interoperability Agreement.

In the meantime, our internal and external counsel have advised me that the proposed modification you've requested will require a deliberative process and a formal approval by the CFX Board in a manner consistent with the original approval of the Interoperability Agreement. Consequently, I can neither sign your letter to acknowledge the agreement of CFX, nor can I agree to obligate CFX to enter into the payment arrangement outlined in your letter at this time.

However, the Authority will agree to work cooperatively and diligently with you to resolve this conflict related to the Interoperability Agreement in an effort to address the concerns outlined in your letter in a mutually agreeable way. Obviously, when we migrate all of our accounts to the Centralized Customer Service Center the issue will be resolved since each participating agency will be responsible for the costs associated with their respective customers' transactions.

CENTRAL FLORIDA EXPRESSWAY AUTHORITY

We will continue to process transactions in the same manner that we previously have done so in compliance with the Interoperability Agreement as we study this issue further and seek the guidance and direction of our new board.

Sincerely,

Laura Kelley
Deputy Executive Director

cc: **Welton G. Cadwell, Chairman, Central Florida Expressway Authority**
Ananth Prasad, Secretary, Florida Department of Transportation.

CENTRAL FLORIDA EXPRESSWAY AUTHORITY

January 12, 2016

Diane Gutierrez-Scaccetti
Executive Director and Chief Executive Officer
Florida's Turnpike Enterprise
PO Box 613069
Ocoee, Florida 34761

Subject: Interoperable Transaction Processing Fees

Dear Director Scaccetti,

The Orlando-Orange County Expressway Authority, succeeded by the Central Florida Expressway Authority (CFX) on June 20, 2014, and Florida's Turnpike Enterprise (FTE) have a long, established partnership with regard to toll collection in Central Florida. The Orlando-Orange County Expressway Authority introduced E-PASS to central Florida in 1994. In 2002, FTE introduced SunPass and our agencies entered into the State of Florida Interagency Electronic Toll Collection interoperability and Reciprocity Agreement so that we could establish state-wide interoperability and process each other's customer transactions.

The Florida Department of Transportation "FDOT" entered into an Interlocal Agreement with the Orlando-Orange County Expressway Authority for the construction and operation of the Wekiva Parkway on June 11, 2014. One condition precedent to this agreement being effective is Section 13.(v), which reads:

"execution of a toll interoperability agreement between OOCEA and FDOT before the date of the opening to traffic of the first segment of the Wekiva Parkway, said agreement to provide for payment by OOCEA to FDOT of the actual cost incurred by FDOT to process toll transponder transactions in excess of the cost of transponder toll transactions processed by OOCEA for FDOT."

CFX's cost to collect an electronic transaction is 1.5 cents. Since FDOT plans to open its first section of the Wekiva Parkway next month, CFX will pay FTE 1.5 cents a transaction for each CFX System transaction processed by SunPass over the number of FTE System transactions processed by E-PASS by the 20th of the month following actual transaction processing.

Please execute the attached Third Bilateral Agreement indicating FDOT and FTE's agreement with the terms of this letter so that it can be presented to the CFX Board for approval.

Sincerely,



Laura Kelley
Executive Director

cc: CFX Board Members

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H.
UPDATE ON
TOLL SYSTEM
REPLACEMENT PROJECT



CENTRAL FLORIDA EXPRESSWAY AUTHORITY

Operations Committee Toll System Replacement Project Update

January 25, 2016



Project Timeline

**NTP (June 8,
2015)**



**Mobilization
(mid-2015)**



**Design (2015-
2016)**



Testing (2016)



**Implementation
(2016-2019)**



**System
completed
(2019)**



**Maintenance
period
(2019-2024)**



CENTRAL FLORIDA EXPRESSWAY AUTHORITY

»» System Replacement Project Overview

- Prime contractor *TRANSCORE*
- \$85,000,000 Project
 - System, Tag Swap and Maintenance
- Expected System Installation Completion - late 2019
- Tag Swap is Completed
- System Maintenance 2019 - 2024



CENTRAL FLORIDA EXPRESSWAY AUTHORITY

System Replacement Project Status

Description	Approximate % Complete
System Design Documentation	70%
Traffic Pedestal Removal	25%
E6 Reader Swap	15%
Test Lane Site	40%
Tag Swap	100%

»» System Replacement Project Status

- Host and network equipment has been ordered with some equipment received
- TransCore lane equipment (Infinity) being manufactured with expected deliveries throughout 2016
- Q-Free Contract - Pending
- Schedule Acceleration - TransCore is reviewing CFX's proposal

»» Questions?



CENTRAL FLORIDA EXPRESSWAY AUTHORITY

I.
UPDATE ON
TOLL PHONE
APPLICATION



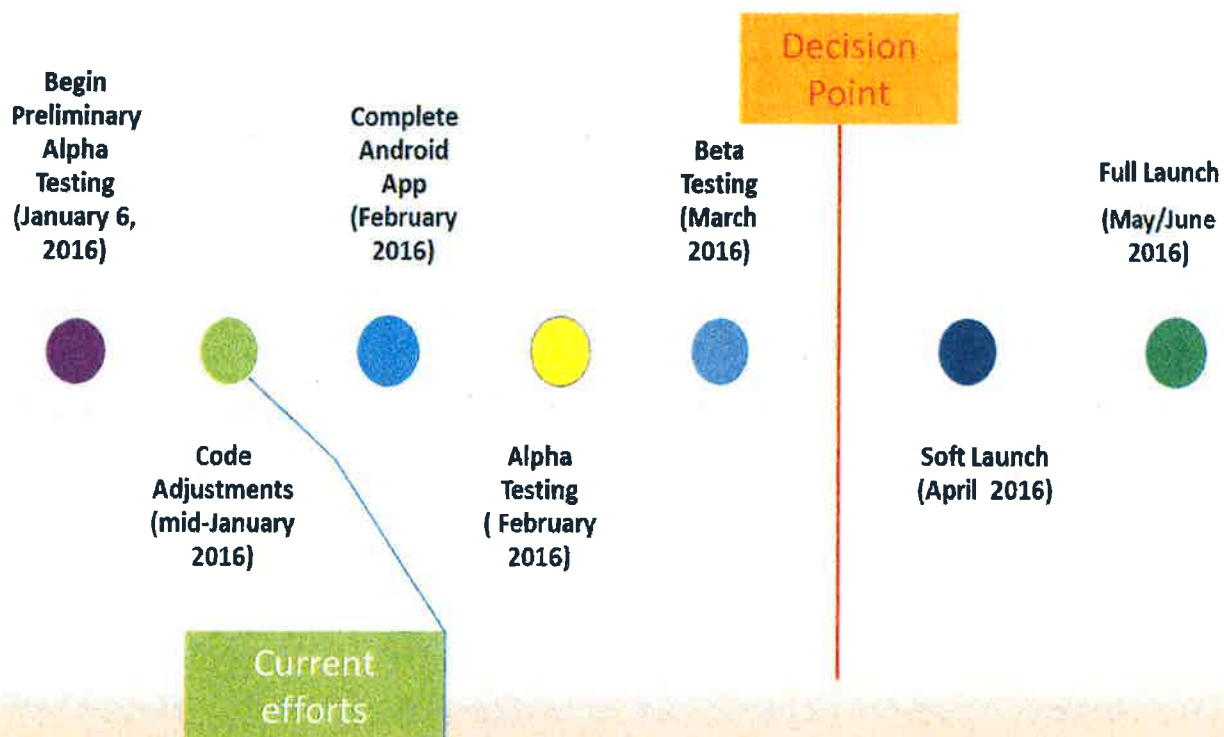
CENTRAL FLORIDA EXPRESSWAY AUTHORITY

Operations Committee
PayTollo Project Update

January 25, 2016



PayTollo Project Testing Timeline



CENTRAL FLORIDA EXPRESSWAY AUTHORITY

PayTollo Project Overview

- Proof of Concept Pilot
- Contract Approved by CFX Board (1/14/16)
 - Alpha Testing
 - Beta Testing
 - If Testing is Successful will enter into an Operations Agreement

CENTRAL
FLORIDA
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AUTHORITY



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PayTollo Project Status

- Preliminary Alpha Testing started 1/6/16
 - 3 CFX employees participated
 - Generated transactions
 - Analyzing App functionality
 - Analyzing Data
- Making Code Adjustments
- Continue Alpha Testing
 - Add additional CFX Employees to Testing

»»» Questions?



CENTRAL FLORIDA EXPRESSWAY AUTHORITY

J.
UPDATE ON
TRANSPONDER SWAP
PROGRAM

»»» Transponder Swap Program

- Program started 6/16/15
- Approximately 220,000 transponders
- Active Program Ended 12/31/15
- Remaining Transponders 20,000
 - 10,000 distributed but not active
 - 10,000 no selection was done
- Cleanup Phase Will End 3/31/15

K.
UPDATE ON
PAY-BY-PLATE

»» Pay By Plate

- Board Approved Pay By Plate Rules
- Expected Implementation 4/1/16
- Replaces Unpaid Toll Notice
- Support Poinciana & Wekiva AET
- Clearer Customer Friendly Billing
- Simplified Roadway Toll Rate Signing

L.
FOLLOW UP TO
INTERNAL AUDIT REPORT

Executive Summary
Recommendations Summary
2010 Ethics Audit
2010 Contracts Audit
2012 Right of Way Audit
2012 Toll Violations Audit
2013 Contracts Audit
2013 Toll Revenue Audit
2014 Maintenance & Safety Plan Audit
2015 Intelligent Transportation Security (ITS) Systems
Security Review
2015 Back Office Customer Call Center Review
2015 COSO Framework Governance Review
2015 Ethics Policy Compliance Review

Central Florida Expressway Authority

Prior Audit Recommendations Follow-Up September 30, 2015

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**OPERATIONS ITEMS
ARE MARKED WITH**



protiviti[®]
Risk & Business Consulting.
Internal Audit.

Executive Summary

As part of the Fiscal Year 2016 Internal Audit plan, Internal Audit (IA) performed a review of open audit recommendations from prior audit reports to verify the implementation status reported by management. Open recommendations from the following audits were evaluated:

- 2010 Ethics Audit
- 2010 Contracts Audit
- 2012 Right of Way Audit
- 2012 Toll Violation Audit
- 2013 Contracts Audit
- 2013 Toll Revenue Audit
- 2014 Maintenance and Safety Plan Audit
- 2015 Intelligent Transportation Security (ITS) Systems Security Review
- 2015 Back Office Customer Call Center Review
- 2015 COSO Framework Governance Review
- 2015 Ethics Policy Compliance Review

Internal Audit last reviewed the status of open audit recommendations in March 2015. Results were reported to the Audit Committee at that time.

This review was completed in September and October 2015, and consisted of meetings with management to determine the status of open audit recommendations and performing testing of management's response, status, and explanation for all recommendations deemed "Complete" or "In Progress." If a recommendation was noted "Not Done," no testing was performed by Internal Audit. In addition, only those recommendations that remained open at the time of the last review have been included in this report. If a recommendation was completed as of March 31, 2015, no further work was performed and the recommendation was not included for review in this report.

Internal Audit did not include or follow-up on recommendations and management action plans from the 2014 Sensitive Data Review. The management action plan was to move the sensitive data identified to an appropriate location or to delete the data. Confirmation that sensitive data was moved or deleted would require an additional project and re-scan of selected systems with a data loss prevention (DLP) tool.

Testing performed included inquiry with the employees responsible for completing the recommendations and obtaining documentation evidence to confirm management's reported status and explanation. In instances where the evidence obtained did not agree with management's status, discussions with management were held and the differences were resolved.

There were no instances where management and Internal Audit did not come to an agreement on the status of a recommendation.

Recommendations Summary

Audit	Open as of March 31, 2015	New Recommendations	Completed Since March 31, 2015	In Progress / Not Done as of September 30, 2015*	Past Due
2010 Ethics Audit	1	0	1	0	0
2010 Contracts Audit	1	0	0	1	1
2012 Right of Way Audit	1	0	1	0	0
2012 Toll Violations Audit	1	0	1	0	0
2013 Contracts Audit	1	0	1	0	0
2013 Toll Revenue Audit	1	0	0	1	1
2014 Maintenance & Safety Plan	2	0	1	1	1
2015 Intelligent Transportation Security (ITS) Systems Security Review	0	11	1	10	2
2015 Back Office Customer Call Center Review	0	6	2	4	3
2015 COSO Framework Governance Review	0	5	3	2	0
2015 Ethics Policy Compliance Review	0	4	0	4	0
Total	8	26	11	23	8

*23 recommendations are classified as "In Progress." 8 of these recommendations are considered "Past Due."

Ethics Audit
June 2010 Recommendations
Status of Recommendations

Internal Audit Recommendation	Management Response	Responsible Party	Management Status at September 30, 2015	Management Verification / Explanation	Testing Results	Due Date	IA Evaluation of Management's Status
To align with leading practices, the Authority vision and mission statements should be revised to incorporate "core values" of the Authority. In addition, consider incorporating the Authority's vision, mission, and core values into the Code of Ethics.	Concur	Laura Kelley, Executive Director	Complete	<p>The Authority has done many things to improve the ethical standards of the organization. The Ethics Policy has been strengthened by the Board in the past two years and has been added to the Authority's web site. Board members and staff receive regular ethics training in accordance with the Ethics Policy and a hotline has been set up so that anyone can anonymously report an ethics violation. All non-payroll checks are posted to the Authority's website. Ethics standards are an integral part of the organization.</p> <p>The Board will consider ethics references in the vision and mission statements through the master plan development process over the next twelve months.</p>	<p>Per discussion with Laura Kelley, Executive Director, the board adopted a mission and vision statement during the September 2015 Board meeting. Internal Audit obtained the minutes from the September 10, 2015 Board meeting and determined the Board adopted the following mission and vision statements:</p> <p>Mission: To build, operate and maintain a mobility network through accountability, fiscally sound practices and a community focus.</p> <p>Vision: To provide the region with a world-class, integrated mobility network that drives economic prosperity and quality of life.</p>	<p>8/31/10</p> <p>Revised: 7/31/12</p> <p>Revised: 12/31/13</p> <p>Revised: 12/31/14</p> <p>Revised: 12/31/15</p>	Concur

Contracts Audit
January 2013 Recommendations
Status of Recommendations

Internal Audit Recommendation	Management Response	Responsible Party	Management Status at September 30, 2015	Management Verification / Explanation	Testing Results	Due Date	IA Evaluation of Management's Status
The Authority should utilize CSC Manager and CSC Supervisor passwords, rather than PINs, to approve adjustment transactions in TRIMS (passwords are required to be changed on a regular basis by the system).	The Authority concurs that moving to a password based approval is in its best interest. However, the change to a password based approval key would be a fairly significant change to the existing system. The current system is currently being reviewed for replacement as part of the Toll System Replacement (TSR) project. Making these changes now may be waste of valuable IT resources if the current system were to be disposed of in the near term. Based on the outcome of the TSR project the Authority would make this change as a part of a newly procured system or would be developed and implemented in the existing system once it was determined that we would be retaining the existing system.	Rene Rodrigue, Director of IT David Wynne, Director of Toll Operations	b) In Progress (Past Due)	b) The change to a password based approval key would be a fairly significant change to the existing system. The current system is currently being reviewed for back office consolidation with Florida's other toll agencies. Making these changes now may be waste of valuable IT resources if the current system were to be disposed of in the near term. The Authority will make this requirement a part of the back office consolidation effort currently underway.	Per discussion with Rene Rodrigue, Director of IT, and David Wynne, Director of Toll Operations, the Authority planned to implement the recommendation as a part of the Centralized Customer Service System (CCSS) project. However, the completion date for the CCSS project has been delayed to 2018-2019 due to the pending back office consolidation and governance agreement between the Authority and the Florida Turnpike Enterprise (FTE). As a result, the IT department will research the feasibility of implementing the recommendation in the current software. Based on the outcome of the research, the IT department will develop and provide a revised action plan and due date by 3/31/16.	Original: 12/31/13 Revised: 12/31/15 Revised: 3/31/16	Concur

Right of Way Audit
February 2012 Recommendations
Status of Recommendations

Internal Audit Recommendation	Management Response	Responsible Party	Management Status at September 30, 2015	Management Verification / Explanation	Testing Results	Due Date	IA Evaluation of Management's Status
<p>1. Recordkeeping: Completeness and Retention:</p> <p>(A) Management should update the policy to accurately reflect a comprehensive list of all documentation that management believes should be maintained onsite. Additionally, checklists should be created and continually updated to help management verify completeness of records and files for each acquired parcel within a given project.</p> <p>(B) Management should determine an appropriate timeline after a parcel case is closed by which to receive (or request if applicable) all pertinent case documents from external legal counsel.</p> <p>(C) The file custodian should create a complete master listing of all parcels to be acquired as determined at the beginning of a new construction project. This master list should be updated to reflect any files closed during the project that did not culminate in an acquisition and be described by a related closing memo.</p>	Concur	Linda Lanosa, Deputy General Counsel	Complete	<p>Completeness of files and timeliness of receipt is an important part of Chapter 119 compliance. Consistency of record keeping is also important to ensure that the public and the Authority have access to key information related to property acquisition.</p> <p>Management will update the Property Acquisition and Disposition Procedures manual to reflect the desired list of documentation and the timeframe for provision of the same. Management will work with outside counsel to create appropriate checklists and incorporate them into the files. Management will review the current purpose and usage of the electronic database and determine if any changes are warranted.</p>	<p>(A) The Right of Way committee approved the changes to the Authority's Property Acquisitions & Disposition Procedures Manual regarding parcel files on 12/6/2013. Additionally, the changes were approved by the Board on 12/12/13. The following 3 checklists were created as a result of the procedure changes: 1) Real Estate Acquisition Closing Binder Checklist for Non-Litigation Parcels; 2) Real Estate Acquisition Closing Binder Checklist for Litigation Parcels; and 3) Real Estate Acquisition Closing Binder Checklist for Surplus Parcels. Internal Audit obtained an example of completed checklists submitted by Winderweede, Haines, Ward & Woodman, P.A. (Wekiva Parkway Parcels 109 and 156) and Shurts & Bowen, noting the checklists were completed and included in the parcel files reviewed. Per discussion with Linda Lanosa, Deputy General Counsel, the third Right of Way counsel (Lowndes, Drosdick, Doster, Kantor & Reed, P.A.) has not closed or settled any parcel files at the time of our follow-up, and therefore have not been required to complete and submit one of the checklists. However, Internal Audit considered the action plan to be complete based on the support reviewed showing the process is in place.</p> <p>(B) Included in the updated manual is a timeline for the provision of the parcel documentation by the external counsel. Per the manual, the Right of Way Legal Counsel shall deliver the complete parcel file to the Authority's Records Custodian no later than 6 months from the date of final parcel activity. This deadline may only be extended upon written request to the General Counsel's office.</p> <p>(C) Per discussion with Joe Passiatore, General Counsel, a complete master listing of all parcels is created by external Right of Way counsel at the beginning of a new construction project. Internal Audit reviewed the status of each parcel is updated by external Right of Way counsel based on progress. However, for any dropped parcels, the parcel is removed from the master listing and the details of the exclusion are documented in the parcel file. Internal Audit obtained an example of a dropped parcel file and checklist from Winderweede, Haines, Ward & Woodman, P.A. and determined the reason for exclusion was documented on the cover letter of the file and the checklist was completed based on the items received prior to exclusion.</p>	<p>Original: 6/30/12</p> <p>Revised: 1/1/13</p> <p>Revised: 6/30/13</p> <p>Revised: 1/1/14</p> <p>Revised: 1/1/15</p> <p>Revised: 9/30/15</p>	Concur

Toll Violations Audit
March 2012 Recommendations
Status of Recommendations

Internal Audit Recommendation	Management Response	Responsible Party	Management Status at September 30, 2015	Management Verification / Explanation	Testing Results	Due Date	IA Evaluation of Management's Status
Management should determine if it is cost beneficial and within the business objectives of the Authority to turn over delinquent violators to a collection agency. The Authority should consider if the UTC is outstanding with the court. Additionally, the Authority should implement a policy containing a time and dollar threshold of how long a UTN or UTC violator should be outstanding before the Authority pursues collections, as well as, a dollar amount the UTN or UTC must reach prior to sending it to collections.	Concur	David Wynne, Director of Toll Operations	Complete	<p>The Authority will investigate enhancing its collection efforts on unpaid tolls to determine if it is cost beneficial and in the best interest of the Authority.</p> <p>Director of Toll Operations will facilitate a review of potential revenue to be collected, possible collection rates, industry practices, legal ramifications and consideration of community perception.</p>	Per discussion with David Wynne, Director of Toll Operations, Louthan Consulting was hired by the Authority to report on industry debt collection practices. Internal Audit obtained a copy of the consultant's report and verified through inspection that it included commentary on industry debt collection practices. After thorough review of the consultant's report, the Authority determined that it was proficient at collecting its debt when compared to industry standards. Based on the consultant's report and consideration of community perception, the Authority determined it is not cost beneficial and not within the business objectives of the Authority to turn over delinquent violators to a collection agency.	<p>Original: 1/1/13</p> <p>Revised: 3/31/13</p> <p>Revised: 1/1/14</p> <p>Revised: 12/31/15</p>	Concur

Contracts Audit
November 2012 Recommendations
Status of Recommendations

Internal Audit Recommendation	Management Response	Responsible Party	Management Status at September 30, 2015	Management Verification / Explanation	Testing Results	Due Date	IA Evaluation of Management's Status
<p>A standard Project Rate/Sub-consultant Change Form should be established by the Authority. Consultants should utilize the form to submit rate and employee changes to the Authority for review and approval before changes to the rate schedule are incorporated in the billings. The standard change form should be used to create a master rate schedule to track updates to the project wage rates. The master rate schedule should be included as an attribute in the monthly checklist being recommended in Observation #6 and be kept in the project file to ensure that the most current information is accessible to the personnel performing the detailed review of the invoices prior to payment approval.</p> <p>The Authority should investigate options to include contract terms and conditions in their standard contract language (e.g. right to withhold payment without proper supporting documentation) to ensure invoices are properly supported.</p> <p>The Authority should also consider whether the itemized wage rate requirement is warranted. Setting wage rates based on job classifications instead of individual employees may increase the efficiency of the invoice review process.</p> <p>The Authority should consider performing a detailed review of the RS&H consultant billings, to determine what amount, if any, is due to or from the consultants as a result of the discrepancies in the billings. This would require the Authority to obtain detailed support for all billings submitted by the consultant and sub consultants for the project.</p>	Concur	Glenn Pressimone, Director of Engineering	Complete	<p>The Authority will create a standard consultant change form and require consultants to submit wage modifications request through the form. The Authority must approve all wage modifications before changes are included in monthly billings. The Contract Support Specialist will update the rate schedule with the approved wage rate changes and create a master rate schedule.</p> <p>The Authority will evaluate the current invoice support requirement and determine if establishing wage rates based on job classification is appropriate.</p>	<p>Per discussion with Glenn Pressimone, Director of Engineering, the wage rate approval process has been implemented and consultant invoices are now reviewed for accuracy, acceptable wage rates, and contractual compliance by Jeannie Perez, Contract Support Specialist.</p> <p>Per discussion with Jeannie Perez, Contract Support Specialist, a project change form was created in the form of the Request for Addition or Promotion that must be submitted to the Authority for review and approval. The Authority has decided to continue to pay design/engineering contractors based on actual contractor wage rates rather than by job classification. Per discussion with Glenn Pressimone, Director of Engineering, the standard contract language will be amended to include a change to the wage rate schedule located in Exhibit "C". The updated wage rate schedule will establish maximum limits for contractor wage rates by job classification. The revised process is only applicable to new design contracts and has been implemented in four contracts as of 9/15/2015.</p> <p>Internal Audit reviewed the contract with TLP Engineering Consultants, Inc. for Design Consultant Services for the SR 408 Widening (Contract No. 001065; Project No. 408-127) and determined that maximum wage rate limits were established by job classification for the level 1 consultants and sub-consultants. In addition, the Request for Addition or Promotion was in use for the active contract as evidenced by requests from the consultant included in the contract files. The Request for Addition or Promotion was reviewed and approved by CFX personnel as evidenced by signatures.</p> <p>Additionally, per discussion with Jeannie Perez, Contract Support Specialist, Glenn Pressimone performed a detailed review of the RS&H consultant billings to determine if there were any amounts due to or from RS&H relating to this project. Audit obtained an invoice discrepancy analysis dated 2/18/2013 and noted a total overpayment to RS&H of \$9,625.87. Audit determined through inspection of subsequent invoices for contract 747 with RS&H that the overpayment was resolved between the parties as of invoice #178.</p>	<p>Original: 1/31/13</p> <p>Revised: 3/31/14</p> <p>Revised: 6/30/15</p>	Concur

Toll Revenue Audit
March 2013 Recommendations
Status of Recommendations

Internal Audit Recommendation	Management Response	Responsible Party	Management Status at September 30, 2015	Management Verification / Explanation	Testing Results	Due Date	IA Evaluation of Management's Status
6. b) The Authority should also consider automating certain aspects of the Attendant's Shift Record log by integrating the unusual occurrence, violations, and insufficient fund transactions within the MLT system. This would reduce the subjectivity of the FTS auditor's interpretation of the manual ASR log.	Concur	David Wynne, Director of Toll Operations	In Progress (Past Due)	b) The Authority currently has this recommendation as a function in the planned Toll System Replacement project that is currently ongoing at this time. The Authority would expect to have the new system in place and operating by July 1, 2015	<p>Per discussion with David Wynne, Director of Toll Operations, this recommendation will be implemented as a function in the planned Toll System Replacement (TSR) project. The Request for Proposal (RFP) has been awarded and the new system is currently in development. Currently, the TSR project is expected to go live in at least one toll plaza by January 2017.</p> <p>Internal Audit obtained the System Requirements advertised as part of the RFP and determined specification 1.5.1.7.2.2 states the system should have drop down menu codes for unusual occurrences. Internal Audit determined the TSR project was awarded to TransCore, LP on 5/14/15 as evidenced by Board minutes. Internal Audit also obtained the current schedule of go-live dates for the new system from David Wynne and noted the first go-live date is scheduled for 1/9/17 in the Coral Hills plaza group.</p>	<p>Original: 7/1/15</p> <p>Revised: 4/30/16</p> <p>Revised: 1/31/17</p>	Concur

Maintenance and Safety Plan Compliance
April 2014 Recommendations
Status of Recommendations

Internal Audit Recommendation	Management Response	Responsible Party	Management Status at September 30, 2015	Management Verification / Explanation	Testing Results	Due Date	IA Evaluation of Management's Status
The Authority should develop written "desktop" procedures that clearly document key aspects of the Authority's maintenance and inspection program, including: Internal procedures for managing and maintaining the Authority's roadways and bridges, Asset tracking, Role of third party maintenance & inspections agreements (scheduling of inspections, repairs, and replacements; outputs of preventative maintenance), Maintenance contract performance monitoring, Work order, maintenance request, and deficiency response deadlines, Incidence and Emergency Response process, and the GEC Annual Inspection process.	Concur	Ben Dreiling, Director of Construction and Maintenance	In Progress (Past Due)	The Authority will develop written procedures to document the pertinent aspects of the Authority's maintenance and inspections operations in regards to bridges, overhead structures, and roadways.	Per discussion with Joe Berenis, Deputy Executive Director, and Steve Geiss, Sr. Roadway Inspector, the department has developed the first draft of the written procedure document and will finalize the document on or before the revised due date.	Original: 12/31/14 Revised: 12/31/15	Concur
Maintenance contracts should accurately reflect actual FDOT requirements for FDOT-issued work orders. Due to the associated contractual risk and opportunity for non-compliance with FDOT regulations, the Authority should consider amending the contract language in the vendor contracts to include the FDOT District 5 work order completion requirements.	Concur	Ben Dreiling, Director of Construction and Maintenance	Complete	The Authority will coordinate maintenance contract updates to require completion of FDOT work orders in accordance with FDOT District 5 deadlines.	Per discussion with Joe Berenis, Deputy Executive Director, and Steve Geiss, Sr. Roadway Inspector, the Authority has renewed the Asset Maintenance contract with ICA and requested that the new language be incorporated. Internal Audit obtained the renewal memo included in the consent agenda for Board approval and determined the suggested revision to the contract language was included as an amendment to the renewal contract. Per discussion with Steve Geiss, Sr. Roadway Inspector, the JCS contract is subject to renewal on 7/1/16. If the contract is renewed, the contract language will be revised for JCS in a similar manner.	7/1/15	Concur

Intelligent Transportation Systems Security Review
February 2015 Recommendations
Status of Recommendations

Internal Audit Recommendation	Management Response	Responsible Party	Management Status at September 30, 2015	Management Verification / Explanation	Testing Results	Due Date	IA Evaluation of Management's Status
1. Review the feasibility of deploying a stronger access control tool to the ITS network cabinets so only authorized personnel (ITS staff or ITS contractors) can access them. This tool should allow ITS to grant access to only those cabinets necessary (not all cabinets in the environment), and should be unique to the ITS environment.	Concur	Corey Quinn, Chief of Technology/Operations	In Progress	Though ITS is not aware of unauthorized access occurring, we recognize the risk of utilizing a generic key. ITS will develop a plan to implement a five year project to address the risk of unauthorized access to the cabinets due to the use of a generic key. Update July 21, 2015: Cyberlock will be installed as part of project 599-525. Estimated completion date is December 31, 2016.	Per discussion with Corey Quinn, Chief of Technology/Operations, ITS has included procurement and installation of Cyberlocks on the ITS cabinets within project 599-525. Internal Audit obtained and reviewed the Request for Letters of Interest for the project and noted the description of the project included the upgrade of legacy ITS cabinet enclosures. Internal Audit obtained and reviewed the consent agenda and Board minutes and noted the Board approved the contract award to URS Corporation Southern on 6/11/15. Per discussion with Corey Quinn, the project is on track for completion by the due date.	12/31/16	Concur
2. Change all current credentials which are default or easily guessable. Implement a requirement to change all vendor supplied credentials before moving a system to deployment as part of the ITS standard system build. Ensure that all passwords are changed at least every 90 days.	Concur	Corey Quinn, Chief of Technology/Operations	In Progress	ITS will change the default credentials on the digital message board controllers where possible (the credentials are hard-coded in some models, and therefore cannot be changed). We will research the feasibility of changing these credentials every quarter, in addition to relying on our response outlined in Observation #1 (Devices that do not have remote password modification capabilities from the manufacturer must rely on the response outlined in Observation #1), and detective controls surrounding the cabinets. Update July 21, 2015: Where possible, RADIUS authentication technology will be used to subsume authentication under the normal CFX password requirements. Where RADIUS cannot be used due to functionality limitations, passwords will be rotated twice a year beginning November 2015.	Per discussion with Corey Quinn, Chief of Technology/Operations, and Atkins personnel, RADIUS technology has been implemented where possible and all other default credentials will be changed by the due date. The change will be documented via sign-off by the performer and a reviewer to ensure the change was completed. The recommendation is in process and is currently on track for completion by the scheduled due date.	11/30/15	Concur
4. Create a document for the ITS process to add and remove users, and document the ITS Incident Response Plan. Ensure all policies are reviewed at least annually to ensure each policy is still relevant.	Concur	Corey Quinn, Chief of Technology/Operations	Complete	ITS is currently creating a document outlining formalized security procedures to be implemented in the environment. The processes outline above will be included in this document. Additionally, ITS will work with CFX to determine a clear delineation of responsibility between the environments to ensure all processes at ITS, including those listed above, are formally documented. Update July 21, 2015: Development is complete, review to be completed by September 1, 2015.	Per discussion with Corey Quinn, Chief of Technology/Operations, and Atkins personnel, the procedures have been documented and placed into a binder in the ITS control room at the Authority. Internal Audit reviewed the binder and determined detailed procedures were included for changing passwords on ITS systems and the IT Department's procedures were included for reference on adding and removing users from ITS systems.	9/1/15	Concur
6. Update these applications to the most recent version available from their vendors. Analyze their business use, and remove them should they be deemed unnecessary. Develop and deploy a formal vulnerability management process that includes periodic vulnerability scans to allow for the identification and application of all updates to systems which do not have the most recent patch level.	Concur	Corey Quinn, Chief of Technology/Operations	In Progress	ITS will remove unnecessary applications, and then discuss the remaining outdated software with CFX IT to refine a process to keep these updated (currently, ITS systems do not have Internet access, and as such, updating these applications would require CFX's involvement and a manual process). Update July 21, 2015: Software update or removal will be completed by February 28, 2016.	Per discussion with Corey Quinn, Chief of Technology/Operations, and Atkins personnel, ITS has completed the initial review and outdated software products are either being removed or updated (depending on use). ITS will update software as possible and provide documentation of final updates, including reasons why specific updates were not possible due to operational needs. The recommendation is currently on track for completion by the scheduled due date.	2/28/16	Concur

Intelligent Transportation Systems Security Review
February 2015 Recommendations
Status of Recommendations

Internal Audit Recommendation	Management Response	Responsible Party	Management Status at September 30, 2015	Management Verification / Explanation	Testing Results	Due Date	IA Evaluation of Management's Status
7. Deploy a log aggregation tool to the environment and feed all logs into this tool so that they may be centralized, correlated and protected. Review these logs periodically to identify actions within the environment which are unwanted or unauthorized.	Concur	Corey Quinn, Chief of Technology/Operations	In Progress (Past Due)	ITS will research the feasibility of including this functionality into the current logging system "What'sup Gold". Update July 21, 2015: Research complete. Implementation of Secure Information and Event Management solution pending upcoming organizational changes.	Per discussion with Corey Quinn, Chief of Technology/Operations, and Rene Rodriguez, Director of IT, the current log aggregation tool used by the IT department would require additional infrastructure to handle the ITS logs as well. IT and ITS will discuss options and determine next steps by the revised due date.	Original: 6/30/15 Revised: 12/31/15	Concur
8. Define hardening procedures and incorporate them into a checklist format to be included in the current build guidelines for all systems. Modify the configuration settings on the above noted systems to ensure they are hardened against attack. The National Institute of Standards and Technologies (NIST) publication on server security is an industry standard regarding system hardening and can be found here: csrc.nist.gov/publications/nistpubs/800-123/SP800-123.pdf Implement a validation process within the current change control procedures to identify unauthorized modifications to systems in the environment to ensure that they remain configured as required by management. This validation process should be performed upon initial system build and at periodic intervals, and should not be performed by the employee who configured the changes to preserve the separation of duties principle.	Concur	Corey Quinn, Chief of Technology/Operations	In Progress	ITS will research the feasibility of removing the functionality outlined above, and include system hardening in the "ITS security procedure" document. Update July 21, 2015: Reconfiguration or removal to be completed by March 31, 2016 pending upcoming organizational changes.	Per discussion with Corey Quinn, Director of Technology/Operations, and Atkins personnel, the recommendation is in process and is currently on track for completion by the scheduled due date. Reconfiguration or removal will be documented via sign-off by a performer and a reviewer.	3/31/16	Concur
9. Disable the services FTP, Telnet, and rlogin and use their secure alternatives SFTP (Secure File Transfer Protocol) and SSH (Secure Shell) 2.0. If disabling these services is not viable, consider applying compensating controls such as segmentation, Intrusion Prevention Systems, or Network Access Control technologies. Additionally, because Rlogin can be configured to allow users to login without providing a password, ITS and CFX should review the deployment of Rlogin on all systems in the environment to ensure that this service is not configured in this manner.	Concur	Corey Quinn, Chief of Technology/Operations	In Progress	ITS will research the feasibility of removing the functionality outlined above, and include disabling insecure services in the "ITS security procedure" document (assuming this functionality is not needed). Update July 21, 2015: Research complete. Documented business justification for necessary clear text protocols will be added to the security manual, and the remaining items will be removed by April 30, 2016.	Per discussion with Corey Quinn, Director of Technology/Operations, and Atkins personnel, the recommendation is in process and is currently on track for completion by the scheduled due date. Justification or removal will be documented via sign-off by a performer and a reviewer.	4/30/16	Concur
10. Change the community strings of all devices within the network from the default values to avoid the possibility of unwanted information leakage or configuration changes. Additionally, disable legacy versions of SNMP (Versions 1 and 2), and utilize the current version of SNMP (Version 3).	Concur	Corey Quinn, Chief of Technology/Operations	In Progress	ITS will develop a plan to modify the default SNMP strings in the environment. Update July 21, 2015: Research complete. Documented business justification for necessary SNMP strings will be added to the security manual, and the remaining items will be removed by July 31, 2016.	Per discussion with Corey Quinn, Director of Technology/Operations, and Atkins personnel, the recommendation is in process and is currently on track for completion by the scheduled due date. Justification or removal will be documented via sign-off by a performer and a reviewer.	7/31/16	Concur

Intelligent Transportation Systems Security Review
February 2015 Recommendations
Status of Recommendations

Internal Audit Recommendation	Management Response	Responsible Party	Management Status at September 30, 2015	Management Verification / Explanation	Testing Results	Due Date	IA Evaluation of Management's Status
11. Leverage CFX dual-factor technology for all ITS contractors who need to connect to the ITS network remotely.	Concur	Corey Quinn, Chief of Technology/Operations	In Progress (Past Due)	ITS will discuss adding contractors and those who need to connect to the ITS environment through the CFX technology with the CFX IT group. Update July 21, 2015: ITS will deploy trial with Atkins personnel to test the impact to personnel responsible for provisioning accounts by August 31, 2015.	Per discussion with Corey Quinn, Director of Technology/Operations, and Rene Rodrigue, Director of IT, the RSA keys necessary to implement the recommendation have been purchased and can be deployed to contractors. However, documentation needs to be put in place to require contractors to return the keys to the Authority, compensate the Authority for any lost or stolen keys, and report personnel changes and misplaced keys within specified timeframes to prevent unauthorized access. IT and ITS will work together to establish the required agreements and documentation by the revised due date and prior to issuing the RSA keys to contractors.	Original: 8/31/15 Revised: 12/31/15	Concur
12. Test configurations changes for upgrading to TLS 1.2, deploying strong cipher suites, disabling SSL renegotiation and disabling compression. Should these configuration changes be successful without causing business disruption, deploy these changes to the environment. Generate new certificates for those that are self-signed, expired, have the wrong hostname, or have weak hashing algorithms.	Concur	Corey Quinn, Chief of Technology/Operations	In Progress	ITS will research the feasibility of removing the functionality outlined above (assuming this functionality is not needed), and move to TLS 1.2 (if supported by ITS systems). Update July 21, 2015: SSL solution dependent on pending organizational changes.	Per discussion with Corey Quinn, Director of Technology/Operations, and Atkins personnel, the recommendation is in process and is currently on track for completion by the scheduled due date. Atkins personnel is working to complete the research by the established due date, but may require more time due to current workloads. Upon completion, justification or removal will be documented via sign-off by a performer and a reviewer.	10/31/15	Concur
13. The Trace / Track method should be disabled or disallowed on identified web servers. Additionally, the PUT and/or DELETE method should be disabled or disallowed on identified web servers. ITS and CFX should also consider applying the principle of least privileges to these servers and remove all unnecessary HTTP Methods, unless there is a business critical need.	Concur	Corey Quinn, Chief of Technology/Operations	In Progress	The system contractor (who administers this system) will be asked to research the feasibility of disabling this functionality when it is not being used, or find other functionality with less risk.	Per discussion with Corey Quinn, Director of Technology/Operations, and Atkins personnel, the recommendation is in process and is currently on track for completion by the scheduled due date.	12/31/15	Concur

Back Office Customer Call Center Review
May 2015 Recommendations
Status of Recommendations

Internal Audit Recommendation	Management Response	Responsible Party	Management Status at September 30, 2015	Management Verification / Explanation	Testing Results	Due Date	IA Evaluation of Management's Status
<p>The Authority should consider making changes to the call center agent scheduling to leverage part-time staff and improve agent utilization to increase agent availability and lower average speed of answer to the call center's target of 60 seconds. There are several inexpensive staffing tools that can be utilized to effectively manage the call center schedule, such as ccModeler.</p> <p>The Authority and third party vendor should also consider performing additional analysis into the factors that drive the ACW time to determine if the ACW time can be reduced in an effort to improve agent availability and improve the ASA. The analysis should include an evaluation of the actual time utilized to capture call servicing notations and other information after the call has ended, and evaluate the extent to which these activities are utilized to service customers or improve the efficiency of future calls.</p>	Concur	David Wynne, Director of Toll Operations, and Joann Chizlett, Director of IT	Complete	The Authority will utilize the recommended ccModeler program to analyze the leverage call center resources more effectively and increase agent availability. The Authority will also adjust the After-Call-Work (ACW) time to 15 seconds.	<p>Per discussion with David Wynne, Director of Toll Operations, and Joann Chizlett, Director of IT, the ccModeler program was purchased and installed in May 2015 and is being used in conjunction with the Erlanger modeler for analyzing the staffing need. Internal Audit obtained an email from EGIS personnel stating the program is being used by the E-PASS and Violation Enforcement Operations contractor.</p> <p>Per discussion with David Wynne, Director of Toll Operations, and Paul Crawford, Systems Administrator, and further inspection of email evidence, the ACW time was adjusted from 20 seconds to 15 seconds.</p>	6/30/15	Concur
There are opportunities to improve the prompts and messaging delivered to customers contacting the Authority by improving prompt and call treatment consistency and attempting to direct more callers to online servicing. The Authority should consider the points above and conduct a thorough evaluation of vector programming and IVR prompting during the implementation of the centralized back office contact center IVR platform to ensure consistent treatment and the use of EWT to inform callers of high wait times and reinforce the use of online or other servicing options.	Concur	Rene Rodrigue, Director of IT	Not Done	The Authority is in the process of procuring and implementing a new IVR system for E-PASS which will include back-up hardware, and the improvement recommendations will be taken into account at that time. In addition, the Authority will provide the recommendations to the centralized back office contact center vendor for consideration during the development of any IVR technology. If the Authority were to agree to move forward with the centralized back office contact center.	Per discussion with Rene Rodrigue, Director of IT, the Authority is still in the process of procuring and implementing the new IVR system. The improvement recommendations will be evaluated throughout the process and the recommendation is on track for completion by the scheduled due date.	6/30/15	Concur
The Authority should use detailed reporting to more accurately measure and assess performance factors that drive key statistics. Internal Audit has partnered with the Authority to develop many of these reports as a part of this review. The Authority should use the reports to develop process improvements to improve the call center's operations and achieve the performance targets. Specific reports that should be leveraged include agent attendance and agent aux reports.	Concur	David Wynne, Director of Toll Operations	Complete	The Authority will track daily, weekly and monthly service level data to assess and improve the performance targets. Service Level is currently set at 80% and will be modified accordingly.	Per discussion with David Wynne, Director of Toll Operations, the service level data was added to the daily and monthly call center reports to monitor performance. Internal Audit obtained an example of each report and determined service level data was included by 15-minute increments and in total for the day on the daily report and was shown by call type and in total on the monthly report.	6/1/15	Concur
To improve the quality assurance process, the Authority should identify a standardized call flow for the types of calls handled by the call center and identify the specific behaviors and skills that should be measured within each segment of the call. This process would enhance the quality assurance process to allow for specific guidance to CSR's and align quality criteria to measurable business goals and objectives (e.g. reduction of call handle time).	Concur	David Wynne, Director of Toll Operations	In Progress (Past Due)	The Authority will work with the third party call center vendor to revise the current quality assurance process to align with the call quality attributes to measure business objectives.	Per discussion with David Wynne, Director of Toll Operations, with the recent turnover in the call center vendor, the quality assurance process is currently under review. The new vendor plans to complete by 11/30/15.	<p>Original: 7/1/15</p> <p>Revised: 11/30/15</p>	Concur

Back Office Customer Call Center Review
May 2015 Recommendations
Status of Recommendations

Internal Audit Recommendation	Management Response	Responsible Party	Management Status at September 30, 2015	Management Verification / Explanation	Testing Results	Due Date	IA Evaluation of Management's Status
<p>The Authority should consider launching an E-PASS product and services website, independent of the corporate website, that would focus on the customer experience and E-PASS activity. An E-PASS focused website would allow customers to navigate the site with ease and would help to deflect customer service activities, such as making unpaid toll notice payment and account replenishments, to the website.</p> <p>Also, call center agent training should also be considered to reinforce the importance of reminding customers to replenish their accounts and/or purchase a transponder in cases where an in-state customer is contacting the authority about a toll violation or citation. These improvements can deflect calls and reduce volume of calls received by the call center.</p> <p>The Authority should also consider adding prompts to the treatment provided on the main number to route callers to the call center in order to limit the number of call center calls received by the receptionist.</p>	Concur	1. David Wynne, Director of Toll Operations, and Joann Chizlett, Director of IT 2. David Wynne, Director of Toll Operations 3. Joann Chizlett, Director of IT	In Progress (Past Due)	1. The Director of Toll Operation and IT will schedule a meeting with the CFX Communication Department to discuss the recommendations to the website and evaluate which recommendation can be implemented. 2. The call center scripts will be updated to include a reminder to customers to replenish and/or purchase a transponder at the end of each call. 3. The Authority will consider adding prompts to the treatment provided on the main number to route callers to the call center in order to limit the number of call center calls received by the receptionist.	1. Complete - Per discussion with David Wynne, Director of Toll Operations, and Joann Chizlett, Director of IT, additional hyperlinks were added to the Authority's website to improve ease of access to the E-PASS website. Internal Audit reviewed the updated website and noted links and pictures were added to direct users to the E-PASS website for UTM payment. 2. In Progress - Per discussion with David Wynne, Director of Toll Operations, with the recent turnover in the call center contractor, the call center scripts are still in development. The new contractor is helping Toll Operations to develop scripts and plans to complete the action plan by 11/30/15. 3. Complete - Per discussion with David Wynne, Director of Toll Operations, and Joann Chizlett, Director of IT, the prompts have been added to the Authority's main number to route callers to the call center. Internal Audit performed a test call and noted three options were provided to the caller (UTN/UTC, E-PASS account, other calls). The prompts added will route calls regarding UTM/UTC and E-PASS accounts to the call center rather than directly to the receptionist.	1. 8/1/15 2. Original: 6/1/15 Revised: 11/30/15 3. 8/1/15	Concur
<p>The Authority should conduct further analysis to determine the percentage of inbound calling line ID's that can be linked to one or more existing accounts in the Authority's servicing applications. If this percentage is greater than 40-50%, this would indicate a substantial opportunity to automate inbound calls and thereby reduce overall handle times.</p> <p>In addition, the Authority should consider developing and conducting agent training to enable agents to take control of inbound calls and identify the information needed to access the caller's notifications, citations, and/or the caller's account as efficiently as possible.</p>	Concur	1. David Wynne, Director of Toll Operations, and Rene Rodrigue, Director of IT 2. David Wynne, Director of Toll Operations	In Progress (Past Due)	1. Further analysis will be conducted to determine the percentage of inbound calls associated with active customer accounts. Based on results of the analysis, The Authority will determine if it is feasible to incorporate call automation based on strategic direction as it relates to the deployment and CFX involvement in centralized back office contact center. 2. The third party call center vendor will provide refresher training on "Call Control" and incorporate "Call Control" techniques into new agent training.	1. Per discussion with David Wynne, Director of Toll Operations, and Rene Rodrigue, Director of IT, the analysis was completed by IT on one day of data as the current phone system retains only 12 hours of call data. However, the original recommendation was to perform the analysis on a larger subset of data. The due date has been revised to provide more time to IT to perform a larger analysis on at least one week of data. The Director of Toll Operations will continue to follow-up with IT so that the analysis is performed prior to the rescheduled due date. 2. Per discussion with David Wynne, Director of Toll Operations, with the recent turnover in the call center contractor, the call center training has not been completed. The new contractor plans to complete by 11/30/15.	1. Original: 7/1/15 Revised: 11/30/15 2. Original: 8/1/15 Revised: 11/30/15	Concur

COSO Framework Governance Review
June 2015 Recommendations
Status of Recommendations

Internal Audit Recommendation	Management Response	Responsible Party	Management Status at September 30, 2015	Management Verification / Explanation	Testing Results	Due Date	IA Evaluation of Management's Status
<p>To incorporate leading practice, the Authority should perform an annual training needs assessment during the performance evaluation process to identify development opportunities throughout the organization.</p> <p>The Authority should also develop an HR Training Request Form to document the business reason for each training, cost, attendees, and Human Resources approval. The addition of the form will formalize the oversight process for training requests and help ensure training expenditures align with business needs, goals, and budgetary restrictions.</p>	Concur	Michelle Malkisch, Chief of Staff	In Progress	<p>The Authority added discussions regarding training needs to the annual performance evaluation process. Performance evaluation forms were updated to request input on training needs from the employee and management.</p> <p>The Authority will develop an HR Training Request Form as recommended and implement a review process to ensure training expenditures are approved and meet business objectives.</p>	<p>Per discussion with Michelle Malkisch, Chief of Staff, the necessary changes were made to the annual performance evaluation forms and the Human Resources department has a current objective to research and coordinate additional training for employees based on the feedback. Internal Audit obtained and reviewed the Performance Evaluation Form and related process documentation and determined a question was added to the form regarding areas where additional training may be needed. This component of the recommendation has been marked complete.</p> <p>Per discussion with Michelle Malkisch, Chief of Staff, the HR Training Request Form is in development and on track for completion by the due date.</p>	12/31/15	Concur
<p>A leading practice is to incorporate employee goal-setting into the annual performance evaluation process. The employee's progress against goals can then be tracked and evaluated annually to create accountability in the performance evaluation process.</p> <p>To accomplish this, the Authority should implement an employee self-review and questionnaire in the evaluation form to facilitate employee involvement in the evaluation process. The self-review and questionnaire should be focused on obtaining feedback from employees regarding their perception of performance, areas for improvement, career development goals, and training needs.</p>	Concur	Michelle Malkisch, Chief of Staff	Complete	<p>The Authority has incorporated employee goal-setting into the annual performance evaluation process. The employee's progress against goals will be tracked and evaluated annually. The Authority implemented an employee self-review and questionnaire in the evaluation form to improve employee involvement in the evaluation process.</p>	<p>Per discussion with Michelle Malkisch, Chief of Staff, the annual performance evaluation forms and process documentation were updated to facilitate greater employee involvement in the process. We obtained and reviewed the Performance Evaluation Form and noted sections were added for the manager's goals for the employee and employee's goals for the current year. A section has also been added to document progress of employee goals from the prior year. Internal Audit also obtained and reviewed the Performance Review Schedule and determined the first step in the process requires the employees to complete the employee section of the review form.</p>	12/31/15	Concur
<p>The Authority should identify and update the desktop procedures for key processes within the IT and HR departments to include the appropriate level of detail. The Desktop Procedures should allow anyone generally competent for the position to perform the job duties.</p>	Concur	Michelle Malkisch, Chief of Staff Joann Chislett, Director of IT	Not Done	<p>The Authority will identify and update the desktop procedures for key processes within the IT and HR departments to include the appropriate level of detail.</p>	<p>Per discussion with Joann Chislett, Director of IT, and Michelle Malkisch, Chief of Staff, updates to procedures are in process and on track for completion by the scheduled due date.</p>	2/28/16	Concur
<p>As a leading practice to help Board members and committee members ensure they fulfill their responsibilities on an annual basis, the Authority should establish checklists that summarize key requirements and responsibilities of the Board, Finance Committee, Operations Committee, and Right of Way Committee. The Authority's Recording Secretary for the Board and Committees should use the checklist to monitor compliance and notify the Board and the Committees of upcoming compliance activities.</p>	Concur	Darleen Mazzillo, Executive Assistant	Complete	<p>The Authority established checklists that summarize key requirements and responsibilities of the Board, Finance Committee, Operations Committee, and Right of Way Committee. The Authority's Recording Secretary for the Board and Committees will use the checklist to monitor compliance and notify the Board and the Committees of upcoming compliance activities.</p>	<p>Per discussion with Darleen Mazzillo, Executive Assistant, the Board and committee checklists have been established to summarize key requirements and responsibilities of the Board and each of the committees. The checklists were reviewed and approved by General Counsel and will be utilized going forward to monitor compliance and keep Board and Committee members informed of upcoming requirements and responsibilities.</p> <p>Internal Audit obtained the Board and Committee checklists and determined the checklists included date/frequency and description of each responsibility, relevant statutes or policies, and the forms to be completed as necessary.</p>	9/30/15	Concur
<p>To enhance communication and awareness, the Authority should consider posting the Make A Difference hotline contact information on the organization's internal intranet to reflect leading practice and to allow for convenient, easy access to the information.</p>	Concur	Michelle Malkisch, Chief of Staff	Complete	<p>The Authority posted the Make A Difference hotline contact information on the internal intranet to ensure it is easily accessible for employees.</p>	<p>Per discussion with Michelle Malkisch, Chief of Staff, the hotline contact information has been posted. Internal Audit obtained a screenshot of the intranet showing the hotline phone number is available on the intranet for employees.</p>	8/30/15	Concur

Ethics Policy Compliance Review
June 2015 Recommendations
Status of Recommendations

Internal Audit Recommendation	Management Response	Responsible Party	Management Status at September 30, 2015	Management Verification / Explanation	Testing Results	Due Date	IA Evaluation of Management's Status
<p>1. To improve the disclosure process and set clear expectations, the Authority should define and document instructions for completing the conflict of interest disclosure form, including the expectation that one form should be completed for the firm/company, guidance on answering questions geared toward an individual, and the objective of the Florida Statute requirement.</p> <p>2. The Authority should consider automating the distribution and monitoring processes for the disclosure form through development of a Conflict of Interest Reporting portal on the company's website. The website can host the disclosure form, instructions, deadline, and supplemental information (corridor maps, ownership listings, etc.); allow users to upload the completed disclosure form; and facilitate tracking and retention of responses received. The Authority should consider centralizing the disclosure process by selecting one department to manage distribution and tracking of the disclosure forms. Based on the current structure of the Authority and the process in place, the Procurement Department would be well-equipped to distribute the notification to consultants to complete the disclosure form and track and retain responses.</p> <p>3. The Authority should define and document consequences for consultants that do not return the completed conflict of interest disclosure form, including the penalties that may be imposed by the Authority. The Authority should consider withholding vendor payments if the consultant is not responsive to the Authority's request to complete the form, which is similar to the enforcement process in other areas of the organization.</p>	Concur	<p>1. Joe Passalatore, General Counsel</p> <p>2. Joann Chizlett, Director of IT, and Claude Miller, Director of Procurement</p> <p>3. Joe Passalatore, General Counsel</p>	Not Done	<p>1. The Authority will define and document instructions for completing the conflict of interest disclosure form as recommended.</p> <p>2. The Authority will develop a Conflict of Interest Reporting portal to automate the distribution and monitoring process for conflict of interest disclosure forms. The Authority will centralize the process to manage distribution and tracking of the disclosure forms to the Procurement Department.</p> <p>3. The Authority will define and document consequences for consultants that are not responsive to the Authority's request to complete the disclosure form.</p>	<p>Per discussion with Joe Passalatore, General Counsel, Joann Chizlett, Director of IT, and Claude Miller, Director of Procurement, recommendations are in process and are currently on track for completion by the scheduled due date.</p>	5/1/16	Concur
<p>The Authority's management and Board should review the previous discussions regarding the definition of "registered lobbyists" and determine if the current definition should be revised to better address the objectives of the Florida Statute.</p>	Concur	Joe Passalatore, General Counsel	In Progress	<p>The Authority will review previous Board discussions and discuss further, as needed, to determine if the registered lobbyist definition should be revised.</p>	<p>Per discussion with Joe Passalatore, General Counsel, the recommendation was discussed further with the Board during the 9/10/2015 Board Meeting and further research is currently being conducted based on the Board's recommendation.</p> <p>Internal Audit obtained and reviewed the draft minutes from the 9/10/2015 Board meeting and noted the Board proposed setting up lobbyist registration at CFX rather than relying on Orange County and the City of Orlando registrations, as the groups that lobby CFX may differ. General Counsel was asked to research the proposal further and return to the Board with a recommendation.</p>	5/1/16	Concur
<p>Board Members should sign an annual ethics certification to acknowledge their understanding and adherence to the Code of Ethics. This will exhibit the Authority's focus on the tone at the top.</p> <p>Additionally, the Authority should consider notifying vendors when the Code of Ethics has been modified to ensure vendors are aware of any new compliance requirements. Vendors should reaffirm their understanding and compliance with the newly adopted Code of Ethics by signing a new Acknowledgement of Standard of Conduct and Code of Ethics.</p>	Concur	Darleen Mazillo, Executive Assistant, and Claude Miller, Director of Procurement	In Progress	<p>The Authority will require Board members to certify their understanding and compliance with the Code of Ethics annually. Going forward, the Authority will notify vendors when the Code of Ethics is modified and require that each vendor sign a new Acknowledgement of Standard of Conduct and Code of Ethics.</p>	<p>Per discussion with Darleen Mazillo, Executive Assistant, the annual Board certification of understanding and compliance with the Code of Ethics has been added to the Board Checklists developed based on the 2015 COSO Governance Review recommendations. The checklists will help facilitate the annual certification from the Board members during 2016. As the process has been implemented, the action plan was marked as complete by Internal Audit.</p> <p>Per discussion with Claude Miller, Director of Procurement, the Procurement Department has accepted the responsibility for implementing the recommendation and put a process in place to send notification to vendors (contractors, consultants, and service providers) in the event that changes are made to the Code of Ethics. Based on the current research regarding lobbyist registration, changes may be made to the Code of Ethics over the next six months. Internal Audit will perform testing to validate this action plan after the update has been made.</p>	5/1/16	Concur
<p>The Authority should consider developing written "desktop" procedures that clearly define and document key aspects of the Authority's ethics activities, including:</p> <ul style="list-style-type: none"> - Conflict of interest disclosure process - Training and ongoing education - Compliance review process - Penalties for violations 	Concur	Joe Passalatore, General Counsel	Not Done	<p>The Authority will develop written procedures to document the Authority's ethics activities and compliance monitoring processes.</p>	<p>Per discussion with Joe Passalatore, General Counsel, and Linda Lanosa, Deputy General Counsel, the recommendation is in process and on track for completion by the scheduled due date.</p>	5/1/16	Concur