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September 29, 2000

Mr. Glenn S. Goord
Commissioner
Department of Correctional Services
Building #2, State Campus
1220 Washington Avenue
Albany, NY 12226-2050

Re: Records Management Program Review
Report 2000-E-1

Dear Mr. Goord:

To assist in your oversight of the Department of Correctional Services (Department), we reviewed the Department's management of official electronic and paper records as of September 6, 2000. In addition, we reviewed specific Department policies, procedures and practices as of September 6, 2000 for the locator record. The locator record shows a history of inmate location information at the cell and bed level within a facility, and it shows inmate transfers between facilities. This record allows the Department to maintain and report timely information regarding capacity, space utilization and space availability. The record also shows a history of an inmate's prior incarcerations.

The primary objective of our review is to provide you with an independent assessment of the adequacy of the Department's overall records management capability as well as the adequacy of its ability to authenticate, secure, store, retrieve and dispose of the locator record. Another objective of our review is to complement both the guidance of the State Archives and Records Administration (SARA) unit and the regulatory initiatives that the New York State Office for Technology is pursuing for the New York State Electronic Records and Signature Act. To complete our review, we interviewed Department personnel and we reviewed Department documents. In addition, we reviewed Department responses to a records management questionnaire (see attached Table). Unlike an audit, a review does not include testing or verification of information and records provided by the Department, and does not include a review of internal controls. Therefore, our review results should not be construed as audited results.

Traditional transaction-based computer applications as well as more technologically advanced systems for document imaging, e-mail, electronic benefits transfer, electronic funds transfer, e-commerce, and Internet-based customer service continue to proliferate. These applications and systems either create new official agency records in electronic format or replace existing paper records with digital versions. In addition, the recently enacted Electronic Records and Signature Act recognize the legal admissibility of automated authorizations in connection with the conduct of business in the State. These initiatives revolutionize the way government works and the way it provides services to the public. However, they also create a variety of

concerns pertaining to the authentication, security, accessibility, storage and retrieval, and disposition of electronic records. To properly address these concerns requires an effective overall approach to the management of official records as well as specific policies, procedures and practices for each critical electronic record that is created and maintained.

The results of our review of the Department's overall management of official records indicate that effective records management practices are being followed. For example, the Record Management Officer's duties and responsibilities are defined in writing, and written policies and procedures appropriately define a record, include an inventory of significant records, include maintenance and disposition schedules and ensure long-term accessibility to records. The results of our assessment of the policies, procedures and practices concerning the electronic locator record indicate that overall practices are effective. For example, only authorized individuals are provided access to the record, there are adequate controls to ensure the integrity of the record, appropriate controls exist over records kept as back up in the event of problems with the system, and appropriate steps are taken to ensure the long-term accessibility to the records. However, the Department should periodically test the system controls to ensure they are functioning as intended. The results of our review are detailed in the attached Table.

Major contributors to this review were Mike Farrar, Joe Quinlan, Adam Geer and Nichole Barrett.

Your comments to this report are welcomed. We wish to express our appreciation to the management and staff of the Department for the courtesies and cooperation extended to our auditors during the review, and hope that it is helpful to your records management oversight.

Very truly yours,



William P. Challice
Audit Director

cc: Robert W. Arnold III - SARA
Julie Leeper - OFT
Donald Felter – DOCS

**DEPARTMENT OF CORRECTIONAL SERVICES
RECORDS MANAGEMENT QUESTIONNAIRE**

TABLE I

A colored traffic light Legend is included in the table below to assist management in focusing an appropriate level of attention on the issues identified in the Response and Comments sections of the Review Findings.

Legend:

	Response/Comments contain matters that may be of immediate concern to management.		Response/Comments contain matters which management may wish to consider.		Response/Comments do not contain issues that require immediate management consideration.
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Review Findings:

	QUESTION	RESPONSE	COMMENT
	A. Overall Agency Records Management		
	A1. Has a Records Management Officer been appointed?	Yes	The Deputy Commissioner for Administration has been designated the Records Management Officer (RMO), although the responsibilities have been delegated to a lower level employee.
	A2. Does the Records Management Officer report to an appropriate level in the organization to facilitate an effective records management policy direction?	Yes	The Deputy Commissioner for Administration is an executive and reports to the highest level of the organization.
	A3. Are the duties and responsibilities of the Records Management Officer defined in writing?	Yes	Directive 2010 contains the duties and responsibilities of the RMO.
	A4. Are records management policies and procedures defined in writing? If so, do they include and adequately address the following issues related to electronic records:	Yes	The Department's Policies and Procedures include specific provisions that appropriately identify and address the indicated issues related to electronic records.

TABLE I (Cont'd)

	<p>A4.1 The definition of a record?</p> <p>A4.2 An inventory of each critical agency record and a related record definition?</p> <p>A4.3 The establishment and maintenance of records disposition schedules?</p> <p>A4.4 Long-term accessibility of records including, but not limited to, E-mail?</p> <p>A4.5 The consideration of records management during the computer systems development and maintenance cycle?</p> <p>A4.6 The maintenance of the security, confidentiality and integrity of sensitive or critical records, including electronic signatures?</p> <p>A4.7 Specifications for ensuring that records required for litigation purposes are admissible and authentic?</p>		
	<p>A5. Does the Records Management Officer participate in ongoing training programs for the Records management Program? Is there ongoing records management training for agency personnel?</p>	<p>Yes</p>	<p>The RMO's designee provides training and answers questions for Department division heads on an as-needed basis. The RMO designee also consults with SARA on an on-going basis for answers to certain questions.</p>
	<p>A6. How often has the agency consulted SARA for assistance with its record management practices? When was the last time SARA was consulted?</p>	<p>Yes</p>	<p>SARA is consulted on an on-going basis. For example, per Department officials, SARA aided in the development of Directive 2011 in 1999.</p>

Record-Specific Procedures - For the remaining questions, consider the specific electronic record identified for the review. (Locator Record)

B. Security Issues			
	<p>B1. Are only specific individuals given the authority to: Create records? Name records? Alter records? Delete records? View records?</p>	<p>Yes</p>	<p>Only specific corrections officers, who work in the movement control office, are appropriately trained to enter locator record transactions. The ability to view records is restricted to appropriate employees.</p>
	<p>B2. Is appropriate access to records restricted to only authorized agency individuals?</p>	<p>Yes</p>	<p>Executive teams in prisons, medical office employees, inmate records coordinators and central office employees who need to know have access. Corrections officers are restricted unless they need access.</p>
	<p>B3. Is appropriate access to records restricted to only authorized external customers?</p>	<p>Yes</p>	<p>The Office of Court Administration, the Commission on Corrections and the Division of Parole have read only access.</p>
	<p>B4. Have tests of the system controls been conducted and documented? How frequently?</p>	<p>No</p>	<p>The Department does not conduct regular systems control tests. Officials indicate that the system is thoroughly tested as revisions to security controls are implemented, rather than on a periodic basis.</p>

TABLE I (Cont'd)

C. Authentication Issues			
	<p>C1. Does the agency have information that identifies and explains its official records (Meta data)?</p>	<p>Yes</p>	<p>Using the New York State Identification Number (NYSID) or Department Identification Number (DIN), or the inmate name identifies the locator record.</p>
	<p>C2. Has the agency established procedures as to how revisions/changes to records are: Made? Tracked? Appended? Authorized?</p>	<p>Yes</p>	<p>Management has designated specific corrections officers, who work in the movement control office in each facility, to make, track, append and authorize revisions and changes.</p>
	<p>C3. Does the agency have a method to differentiate original records from revised, duplicate, or backup records?</p>	<p>Yes</p>	<p>Original records are on-line and backup records are on tape.</p>
	<p>C4. Has the agency established a method to maintain the integrity of the original record?</p>	<p>Yes</p>	<p>Any revision to an original record results in a "cancellation report." All cancellation reports are reviewed for appropriateness.</p>
	<p>C5. Does the agency have a clear, specified understanding of how the records might be used for legal or evidentiary purposes? If not, how are these needs met?</p>	<p>Yes</p>	<p>The courts have accepted the computer locator record after the Department attests that it is the official record of inmate locations and movements.</p>

TABLE I (Cont'd)

D. Storage Issues			
	<p>D1. Are there adequate controls over the storage of the records?</p>	<p>NA</p>	<p>The Department does not have a need to store records, since officials indicate that all records are active records.</p>
	<p>D2. Do only appropriate individuals have access to the stored records?</p>	<p>Yes</p>	<p>Office For Technology (OFT), who manages the State's data center, has physical access but not on-line access. Only appropriate Department personnel have on-line access.</p>
	<p>D3. Does the agency maintain backup copies of the records? Where? Who has access?</p>	<p>Yes</p>	<p>Tape backup is performed on a weekly basis. Copies are kept in the Department's central office and the State's data center. Only certain Department computer programmers have access.</p>

TABLE I (Cont'd)

E. Retrieval Issues			
	E1. Are there adequate controls over the retrieval of the records from storage?	NA	The Department does not have a need to store and access records, since officials indicate that all records are active records.
	E2. Has the agency ensured that the records will be accessible and useable for long-term needs? If so, how?	Yes	The Department updates all electronic locator records when it makes program changes, even for inmates who have been discharged.
	E3. Are records searchable and retrievable for reference?	Yes	The locator record is searched for using NYSID or DIN number, or the inmate name.
	E4. Is there a written disaster recovery plan?	Yes	The Department has a plan to restore the data in case of a data-related disaster. It is working with OFT to formulate a plan in case of a physical disaster that destroys the computer system location.
F. Disposition Issues			
	F1. Are there appropriate controls to ensure records are disposed of properly, and not disposed of prematurely?	Not Applicable	The Department does not dispose of the locator record; instead, it maintains the record for future legal and health emergency purposes. All records since the inception of the electronic locator system in 1987 are on-line.
	F2. Is an appropriate individual responsible for record disposition?	Not Applicable	See F1.

TABLE I (Cont'd)

	<p>F3. Does the agency maintain documentation of disposition activities, including the:</p> <p style="padding-left: 40px;">Reason?</p> <p style="padding-left: 40px;">Number of records?</p> <p style="padding-left: 40px;">Date?</p>	<p>Not Applicable</p>	<p>See F1.</p>
	<p>F4. Is there a written disposition plan?</p>	<p>Not Applicable</p>	<p>The Department has an appropriate written disposition plan for its records. However, these plans do not apply to the locator record since it does not dispose of the locator record.</p>