

In addition to concurring with the need for more complete testing and improved records retention, the CISO further recommends developing emergency change control procedures to ensure appropriate coordination and controls occur during critical incident response.

The Auditor-Controller concurs with the findings and recommendations made by the OASIS Information Security Officer. In addition, he identified two key deficiencies in management oversight of this process within his own office. Chiefly, he noted it was standard practice for his Payroll Division to validate the amount of the direct deposit file the day after authorizing Union Bank to distribute the direct deposits, and that this task was completed and authorization signed by line staff without management review or sign off.

To correct these deficiencies, the Auditor-Controller immediately moved validation of the direct deposit file up one day so it occurs prior to authorizing distribution of payments. Going forward, the Auditor-Controller also intends to institute management-level review and signature of the transmittal register sent to Union Bank authorizing distribution of the direct deposits.

The Executive Office concurs with the findings and recommendations of the OASIS Information Security Officer, the Auditor-Controller, and CISO. While we concur OASIS' policies and procedures need to be strengthened and vigilantly followed, neither the CISO's report, the OASIS ISO's report, nor the Auditor-Controller's report provide evidence of error in employee pay, retirement benefits, or income tax reporting. The Executive Office will continue to work with OASIS and the Auditor-Controller to ensure all recommendations are implemented expediently to mitigate the potential for recurrence of a similar incident.

In addition, the CEO referred this matter for further discussion and review by the recently established OASIS Governance Committee, co-chaired by the Assistant CEO and Finance Director and comprised of executives from OASIS, Auditor-Controller, Human Resources, and Purchasing departments.