



Water Department Security Follow-Up Audit

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EXECUTIVE SUMMARY

On 11/20/2018, the Jefferson Parish Office of Inspector General (JPOIG) issued an audit titled *Water Department – Physical Security*. The audit resulted in four findings pertaining to a lack of security at various Jefferson Parish Water Department (Water Department) facilities. In 2022, the JPOIG conducted a follow-up audit of the Water Department’s physical security. The objective of the follow-up audit was to determine if the Parish Administration and the Security Division resolved the findings noted in the initial audit by implementing corrective actions. The scope period was 01/01/2021 through 02/28/2022.

As shown in Table 1, the JPOIG noted that three (3) of the four (4) findings were resolved, and one (1) finding was partially resolved. The JPOIG notes that the original audit was issued under a previous Administration and past Director of Security.

Table 1: Follow-up Summary

Original Finding #	Original Finding	Finding Status
1	Security weaknesses existed at the East Bank Water Complex because a number of cameras were not functional. There was no evidence that the Security Division made annual inspections of facilities or recommended corrective security measures for security weaknesses.	Resolved
2	There were many instances of multiple cards and active credentials issued to retired and terminated employees in the security database.	Resolved
3	Security Division management could not provide evidence of the required annual inspections of all Parish owned facilities as required by Parish ordinance. The Security Division provided evidence to support a limited number of site visits that were reactive in nature and driven by specific departmental requests.	Resolved
4	Although Parish ordinance required the Security Division to assess security risks for Parish facilities annually, the ordinance did not require the Security Division to establish a baseline for the security measures at critical infrastructure facilities. In addition, department directors were not required to implement the Security Division’s recommendations.	Partially Resolved

BACKGROUND

The Water Department is one of several Parish departments which collectively comprise of Jefferson Parish Public Works.¹ The Water Department’s functions include a river intake, pump stations, treatment facilities, above and underground storage, and clean water distribution. The Water Department provides water utility services to approximately 151,000 accounts and operates water purification complexes on the East and West banks of the Mississippi River. Its distribution system consists of approximately 1,800 miles of water mains, 23,732 valves, and 16,407 hydrants. The East Bank Water Complex (EBWC) houses four water purification plants which can process up to 87 million gallons of potable water. The West Bank Water Complex (WBWC) houses two water purification complexes which can process up to 61 million gallons of potable water. In 2020, the Water Department received \$36.4 million in charges for services.²

The Security Division is responsible for providing security services to Jefferson Parish (Parish) operations, which includes the Water Department. The Security Division serves to:

optimize the protection of employees, visitors, and property by providing a Threat/Risk analysis of all parish wide operations, facilities, properties, and guidelines in order to identify all critical infrastructure vulnerabilities to prevent the loss of life, loss of property, loss of operation by reducing the threat and risk from acts of violence and theft.³

The Water Department provides critical services to Jefferson Parish residents and ensuring the integrity and security of this critical infrastructure is essential. On 11/20/2018, the JPOIG issued an audit titled *Water Department – Physical Security*. The audit resulted in four findings pertaining to a lack of security at various Water Department facilities.

Acronyms

The JPOIG used the following acronyms in this report.

EBWC	East Bank Water Complex	Water Department	Jefferson Parish Water Department
JPOIG	Jefferson Parish Office of Inspector General	WBWC	West Bank Water Complex
Parish	Jefferson Parish		

¹ Other Public Works departments include Drainage, Sewerage, Streets, Parkways, Environmental Affairs, and Engineering.

² 2022 Annual Budget - Jefferson Parish, Louisiana. October 25, 2021. p.261.

³ 2022 Annual Budget - Jefferson Parish, Louisiana. October 25, 2021. p. 271.

OBJECTIVES, SCOPE, & METHODOLOGY

Objectives, Scope, & Methodology

The JPOIG conducted a follow-up audit of the Water Department’s physical security. The objective of the follow-up audit was to determine if the Parish resolved the findings noted in the initial audit by implementing corrective actions. The three (3) finding status categories are defined as:

Resolved	The auditee implemented corrective actions that resolved the finding noted in the original report.
Partially Resolved	The auditee implemented corrective actions, but the corrective actions did not fully resolve the finding noted in the original report.
Unresolved	The auditee did not implement actions that resolved the finding noted in the original report.

The scope period of the follow-up audit was 01/01/2021 through 02/28/2022. To accomplish the follow-up audit objective, the JPOIG:

1. Conducted interviews with the Security Division Director;
2. Obtained and reviewed policies, procedures, and other documents; and
3. Reviewed relevant Parish ordinances.

Our follow-up audit did not observe or conduct full testing to determine if the Parish Administration and Security Division implemented new procedures. Thus, we make no determination as to their effectiveness, which would require a new audit with full testing.

Auditing Standards

The JPOIG conducted this follow-up audit in accordance with the Quality Standards for Offices of Inspector General.⁴

Legal Authority

The authority to perform this follow-up audit is established in Jefferson Parish Code of Ordinances § 2-155.10 and La. R.S. 33:9613.

⁴ “Quality Standards for Offices of Inspector General,” *Principles and Standards for Offices of Inspector General* (Association of Inspectors General, 2014).

FOLLOW-UP FINDING #1: WATER DEPT PHYSICAL SECURITY

Initial Finding #1:

Security weaknesses existed at the EBWC because a number of cameras were not functional. There was no evidence that the Security Division made annual inspections of Parish facilities or recommended corrective measures for security weaknesses.

JPOIG Recommendation #1:

1. Security Division management, within 60 days, should:
 - a. Complete an updated comprehensive assessment of physical security consistent with best practices for Water Department facilities.
 - b. Make recommendations to address areas identified in the comprehensive assessment. The recommendations should include baseline needs and proactive intelligence led elements.
 - c. Utilize written and supported security assessment protocols.
2. Water Department management, within 90 days, should implement baseline security measures.

Parish Administration Response #1:

Recommendation **Accepted** by the Parish Administration.

Recommended adding to the number of security cameras already in place at the facility. Upgrading the technology of the surveillance equipment, allowing for enhanced capture and storage of surveillance footage. Controlled access to specific areas will be addressed.



Finding #1 Summary: Security weaknesses noted at EBWC.
Finding Status: RESOLVED

Follow-up Results #1:

1. The JPOIG inquired of the Director of Security and noted that:
 - a. Department directors must turn in a monthly security assessment to the Director of Security for his review.⁵ The JPOIG judgmentally selected the months of April 2021, December 2021, and February 2022 and obtained all monthly assessments which totaled 196. The JPOIG noted the assessments established an informal baseline level of security for each department (e.g., lighting, physical barriers, etc.). These assessments contained a description of the security measure (e.g., alarm system – functioning properly), an assessment of “acceptable” or “not acceptable,” and any deficiencies noted. The Security Division also conducted annual assessments for the East Bank and West Bank Waterworks. The JPOIG obtained the 04/06/2021 assessment.

⁵ Department directors or their designated personnel included community centers, head start programs, transportation, recreation, juvenile, pumping stations, and water treatment facilities.

- b. The monthly and annual security assessments allow for recommendations to be shared between department managers and the Security Division. All recommendations are compiled on the yearly inspection and sent to the Director of Security for review.
 - c. The JPOIG noted the Director of Security developed a “*Security Equipment Purchases & Installations, Access, & Employee Identification Card Procedures*” policy. The JPOIG inspected the policy and noted it contained procedures for access control and validation processes that could be applied in a routine manner. The policy also required all new employees to sign access forms and review the access policy at orientation.
2. The Water Department fixed the broken cameras, upgraded their cameras to a higher resolution, and made the footage accessible online by authorized users which increased preventative and detective internal controls.

FOLLOW-UP FINDING #2: UNAUTHORIZED BADGE ACCESS

Initial Finding #2:

There were many instances of multiple cards and active credentials issued to retired and terminated employees in the security database. Refer to Table 2.

Table 2: Former Water Employees with Security Access

Location	April 2018		July 2018	
	Retired	Terminated	Retired	Terminated
East Bank	17	42	1	1
West Bank	15	46	0	0
Total	32	88	1	1

JPOIG Recommendation #2:

1. Security Division management should develop and implement written policies and procedures to manage access controls. The written policies and procedures should include controls and validation processes that can be applied in a routine manner.
2. Security Division management should provide lists of all active employees to each department periodically for departmental validation. The JPOIG suggests quarterly.

Parish Administration Response #2:

Recommendation **Accepted** by the Parish Administration.

Coordinating employee status with Parish Departments, Human Resources, and the Personnel Department concerning daily leave, disciplinary status, and any other employment status affecting employee access.



Finding #2 Summary: Active credentials were issued to retired/terminated employees.

Finding Status: RESOLVED

Follow-up Results #2:

The JPOIG inquired of the Director of Security and noted that the:

1. Director of Security developed a “*Security Equipment Purchases & Installations, Access, & Employee Identification Card Procedures*” policy. The JPOIG inspected the policy and noted it contained procedures for access control and validation processes that could be applied in a routine manner. The policy also required all new employees to sign access forms and review the access policy at orientation.
2. The IT Department sent a Terminate Report to the Security Division each evening by 7:00 p.m. This report listed the names of employees, the date of their termination, and the reason for their termination. Each morning, the Security Division ensured the access cards for each employee were deactivated, regardless of whether that employee turned in their access cards. The JPOIG judgmentally selected two termination reports dated 01/28/2022 and 02/04/2022 and noted eight employees were listed as terminated. The JPOIG compared the

terminated employees to the Water Access Report and noted none of the eight employees were included on the Water Access Report and did not have card access to any Parish facilities.

FOLLOW-UP FINDING #3: SECURITY REQUIREMENTS

Initial Finding #3:

Security Division management could not provide evidence of the required annual inspections of all Parish owned facilities as required by Parish ordinance. The Security Division provided evidence to support a limited number of site visits that were reactive in nature and driven by specific departmental requests.

JPOIG Recommendation #3:

1. The Parish President or designee, within 30 days, should complete a comprehensive review of the Security Division's performance against the legal mandates and authority to determine what areas are not being performed or performed satisfactorily.
2. The Office of the Parish President, within 90 days, should implement a written action plan to ensure that the Security Division is in compliance with the Parish ordinance and/or revise the ordinance to reflect more effective and attainable outcomes.
3. The Office of the Parish President should require the Director of Security to submit annual confidential reports on the status of Parish facilities and employee safety.

Parish Administration Response #3:

Recommendation **Accepted** by the Parish Administration.

Establish a security matrix to be used in security inspections by the Security Division. Provide inspection lists/surveys to be used by department directors.



Finding #3 Summary: Annual inspections were not performed on all Parish facilities.

Finding Status: **RESOLVED**

Follow-up Results #3:

As noted in the Finding #1 Follow-up Results, the Security Division received monthly assessments from department directors, which established an informal baseline for each department. The Security Division also conducted a comprehensive annual assessment.

FOLLOW-UP FINDING #4: NO BASELINE SECURITY MEASURES

Initial Finding #4:

Although Parish ordinance required the Security Division to assess security risks for Parish facilities annually, the ordinance did not require the Security Division to establish a baseline for the security measures at critical infrastructure facilities. In addition, department directors were not required to implement the Security Division's recommendations.

JPOIG Recommendation #4:

1. Security Division management should develop and adopt supportable security assessment protocols to be applied across the various Parish facilities, including critical infrastructure.
2. Security Division management should establish baseline levels of security for all critical Parish infrastructure, facilities, and departments.
3. The Parish Administration and/or Council should mandate, through policy or law, that each Parish department implement a baseline level of security.

Parish Administration Response #4:

Recommendation **Accepted** by the Parish Administration.

Working with the Department of Homeland Security, we have established a D.H.S. Dashboard app that aids in establishing security protocol and improvements. Working with Director West, perimeter security will be enhanced and updated, and additional surveillance cameras are being installed.



Finding #4 Summary: No baseline security requirements in effect.
Finding Status: **PARTIALLY RESOLVED**

Follow-up Results #4:

1. As noted in the Finding #1 Follow-up Results, the Security Division received monthly assessments from department directors, which established an informal baseline for each department. The Security Division also conducted a comprehensive annual assessment.
2. The JPOIG inquired of the Director of Security who asserted that he was "in the process of developing" policies that would establish a formal baseline level of security. He also asserted that he conducted numerous security and safety lectures to other departments.
3. The JPOIG reviewed the Jefferson Parish Code of Ordinances § 2-515.16. The ordinance does not require that the Security Division establish a baseline for security measures at critical infrastructure facilities.

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