To: Eileen Fitzgerald, Jeffrey Bryson, Michael Forster, and Paul Kealey

From: Frederick Udochi
cc: Thomas Lyons, Jayna Bower, Mia Sowell

Date: March 7, 2011

Subject: CounselorMax Oversight Review

Enclosed is a copy of the recently concluded CounselorMax Oversight Review. Please review and let me know if you have any comments or questions. Thanks.
Executive Summary
CounselorMax Oversight Review

<table>
<thead>
<tr>
<th>Business Function and Responsibility</th>
<th>Report Date</th>
<th>Period Covered:</th>
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</thead>
<tbody>
<tr>
<td>Information Management, NeighborWorks Center for Homeownership Education and Counseling</td>
<td>December 17, 2010</td>
<td>September 2010 through November 2010</td>
</tr>
</tbody>
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Assessment of Internal Control Structure

<table>
<thead>
<tr>
<th>Effectiveness and efficiency of Operations</th>
<th>Generally Effective.¹ Recommendations in specific areas are noted below.</th>
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</thead>
<tbody>
<tr>
<td>Reliability of Reporting</td>
<td>Generally Effective. Recommendations in specific areas are noted below.</td>
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</table>

¹ Legend for Assessment of Internal control Structure: 1. Generally Effective: The level and quality of the process is satisfactory. Some areas still need improvement. 2. Inadequate: Level and quality of the process is insufficient for the processes or functions examined, and require improvement in several areas. 3. Significant Weakness: Level and quality of internal controls for the processes and functions reviewed are very low. Significant internal control improvements need to be made.
### Summary of Observations and Recommendations:

<table>
<thead>
<tr>
<th>Summarized Observation</th>
<th>Management Agreement with Observation (Yes/No)</th>
<th>Internal Audit Recommendation</th>
<th>Accept IA Recommendation (Yes/No)</th>
<th>Management’s Response to IA Recommendation</th>
<th>Estimated Date of Implementation</th>
<th>Internal Audit Comments on Management Response</th>
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<tr>
<td>1. While we acknowledge that CounselorMax is part of a budgetary process as was evident in materials obtained for CounselorMax, we noted that the concept of integrating capital projects such as CounselorMax into a formalized portfolio of projects a Capital Budget would be an added benefit as a means of further enhancing the budgetary process.</td>
<td>Yes.</td>
<td>We recommend creation of an overall CMAX Project Plan in order to facilitate enhanced project monitoring and coordination for both Training and IM CMAX initiatives.</td>
<td>Yes.</td>
<td>We appreciate IA acknowledging the considerable planning that has enabled CMAX development, support, training, administrative and promotional to occur in a successful and effective manner. We will undertake the necessary steps to document the plans in a more integrated fashion across activity areas.</td>
<td>Oct-2011</td>
<td>Internal Audit accepts management’s response and has no further comments.</td>
</tr>
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2 The observations and recommendations in this section are summarized at a high level for informational purposes. To obtain a full, detailed explanation of each, please refer to the “Observations and Recommendations” section. Management’s response is directly related to the detailed observations and recommendations noted in the “Observations and Recommendations” section.
<table>
<thead>
<tr>
<th>Summarized Observation; Risk Rating</th>
<th>Management Agreement with Observation (Yes/ No)</th>
<th>Internal Audit Recommendation</th>
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<td>2. While CMAX data is backed up daily via disk-to-disk backup and weekly to an offsite location, and a cold-site is available in the event of a disaster, disaster recovery could be improved by moving to a more real-time disaster solution such as a warm-site. Per inquiry with Information Management, implementation of a warm-site solution has begun and is planned for completion in mid-January 2011.</td>
<td>Yes</td>
<td>We recommend continuing implementation of the warm-site disaster recovery solution, to minimize potential down-time in the event of a disaster.</td>
<td>Yes</td>
<td>The failover system is in place and functional. Final testing and documentation process are underway.</td>
<td>Mar-2011</td>
<td>Internal Audit accepts Management’s response and has no further comments.</td>
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<td>3. CMAX change management procedures should be formally documented and enhanced to include User Acceptance Testing and Signoff prior to production implementation of system enhancements. Formalized and documented change management procedures help to ensure only properly authorized changes are made to the system, code or data and that changes are thoroughly tested to ensure functionality and alignment with the original business need.</td>
<td>Yes</td>
<td>We recommend documenting a formal Change Management procedure that includes User Acceptance Testing (UAT) and Signoff prior to production implementation of system enhancements, inclusion of NCHEC in the UAT process, as well as coordination with Hosting vendor(s) regarding patch and server maintenance. A similar recommendation was noted in the September 2010 audit report on the Online Reporting System/ Data Collection Integrity and Analysis review. Management agreed that while change management procedures and controls were in place, the process lacked documentation. IM agreed to document the change management policies and procedures by June 2011.</td>
<td>Yes</td>
<td>Management acknowledges the need to improve documentation of UAT testing and results. IM will begin formally recording and retaining UAT activity and results for future CMAX releases, commencing with the summer 2011 CMAX release.</td>
<td>Sep-2011</td>
<td>Internal Audit accepts management’s response and has no further comments.</td>
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<td>4. NW lacks a contractual mechanism to hold vendors (Hosting) and (Development) accountable for compliance with. Additionally, contracts do not provide NWA the right to audit or nor do they require the vendors to provide an annual Service Auditors Report attesting to the design and operating effectiveness of these controls. Per inquiry with IM, was required to have a SAS70 on file at the time of contract signing.</td>
<td>Yes</td>
<td>In the near term, consider available options for obtaining assurance that (Hosting) and (Development) comply with NWA Information Security and Change Management policies and procedures. In the long term, vendor agreements should be amended to ensure a right to audit (for compliance) and/or annual Service Auditors Report. Note that effective June 15, 2011, the SAS70 standard will be replaced by standards SSAE 16 and ISAE 3402, and thus Service Auditor Reports will need to be performed and issued in accordance with these new standards. A similar recommendation was noted in the September 2010 audit report on the Online Reporting System/ Data Collection Integrity and Analysis.</td>
<td>Yes</td>
<td>In FY2011 the office of General Counsel, in cooperation with Information Management, will complete a review of hosting and software development contract language to ensure ample considerations have been made for information security and change management controls.</td>
<td>Jun-2011</td>
<td>Internal Audit accepts management’s response and has no further comments.</td>
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Management noted that the Office of General Counsel, in cooperation with Information Management, will complete a review of hosting and software development contract language to ensure ample considerations have been made for information security and change management controls. Management agreed to implement this recommendation by June 2011.
**Risk Rating Legend:**

**Risk Rating: HIGH**

A serious weakness which significantly impacts the Corporation from achieving its corporate objectives, financial results, statutory obligations or that may otherwise impair the Corporation’s reputation.

**Risk Rating: Moderate**

A control weakness which could potentially undermine the effectiveness of the existing system of internal controls and/or operational efficiency, integrity of reporting and should therefore be addressed.

**Risk Rating: Low**

A weakness identified which does not seriously detract from the system of internal control and or operational effectiveness/efficiency, integrity of reporting but which should nonetheless be addressed by management.

<table>
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<tr>
<th></th>
<th>Management Response to Audit Review Recommendations</th>
<th>CounselorMax Oversight Review</th>
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</thead>
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<tr>
<td># Of Responses</td>
<td>Response</td>
<td>Recommendation #</td>
</tr>
<tr>
<td>4</td>
<td>Agreement with the recommendation(s)</td>
<td>4</td>
</tr>
<tr>
<td>0</td>
<td>Disagreement with the recommendation(s)</td>
<td>N/A</td>
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CounselorMax Oversight Review

Objective

The engagement objective of this audit review is to assess the extent that the CounselorMax purchase achieves corporate goals and objectives.

Scope

CounselorMax is a web-based client management system, which creates and manages client profiles, establishes a client record, creates a case file for each client, tracks all counseling activity including case resolution, has the ability to customize reports and generates the HUD compliant forms. It is used by a multitude of housing counseling agencies across the nation, including NeighborWorks® Organization’s (NWOs), National Foreclosure Mitigation Counseling (NFMC) program grantees, sub grantees and others.

CounselorMax was originally developed and owned by EMTA and later subsidized by Freddie Mac. However, NeighborWorks® America purchased the application in December 2007. NeighborWorks® America conducts a number of CounselorMax training sessions at National Training Institutes (NTIs) and place-based trainings and has Training (NeighborWorks Center for Homeownership Education and Counseling - NCHEC) and Information Management (IM) employees dedicated to components of its technical, business and customer support.

Included in our scope was a review of the risks and controls surrounding:

- Purchase Agreement & Project Management
- System Interfaces
- Performance measurement indicators and alignment with NeighborWorks’ Online Reporting System (ORS).
- Policies and Procedures relating to Training, Change Management, Data Input, Logical Access and Privacy
- CounselorMax related costs and benefits

Internal audit contracted the services of [redacted] as the IT consultant on this review. Enclosed in Appendix A is a brief bio on [redacted], Principal Consultant in [redacted].

Background

In December of 2007 NeighborWorks entered into a Memorandum of Agreement with [redacted] in order to purchase a client management system that was at the time, subsidized for use by housing counselors by Freddie Mac. The Purchase Agreement was executed on December 20, 2007 and the client management system known as CounselorMax (CMAX), became a NeighborWorks-owned system. Along with the Purchase Agreement, NWA agreed to continue providing CMAX to users subsidized by Freddie Mac, , via a licensing
agreement. Additional agreements were entered to assign all user licenses to NWA, continue EMT Applications Help Desk Support and System Development arrange a third-party to host the system, and assign an agreement between [Redacted] and [Redacted] to NWA to allow pulling of credit scores from [Redacted] into CMAX.

All contract documents were duly signed by the Chief Operating Officer of NWA and [Redacted], President of [Redacted]. Key terms that protect NWA interests and integrated into the contractual agreement were the transfer of Source and Object Code, Trademarks, URL and Domain Names and Customer Contracts, as defined in the Purchase Agreement. Payments were made according to a staggered schedule rather than in lump sum, and were tied to metrics that ensured that the user base continued to utilize CMAX throughout a two year period. Additionally, [Redacted] provided evidence of their Business Insurance Policies and had its shareholders agree to a two year non-compete period to provide additional assurance to NWA of liability coverage as well as lack of direct competition from the Seller.

Since the purchase agreement, NWA Information Management (IM) has transitioned the majority of Help Desk support from [Redacted] to a model that involves IM handling all Help Desk functions except for complicated bug fixes which can still be sent to the application developer, [Redacted], for resolution. NFMC requirements and other reporting requirements have been integrated into the system, and the NWO user population is in the process of migrating from the existing client management system, NSTEP, to CMAX. Additionally, significant effort has been put into business planning for CMAX. Currently, three scenarios are under consideration pending funding sources: (a) Steady State maintains the application as-is with minor enhancements, (b) Competitive State adds competitive and user-friendly features to the system; and (c) Aggressive State seeks to position CMAX as the preeminent Client Management software. For FY 2011, the Steady State option was funded, and will include funding for ongoing Training and Support; Product Planning; Communication, Outreach and Marketing; limited Development Activities; Help Desk and Code Maintenance; and Hosting services.

In order to coordinate Project Management, monthly CounselorMax team meetings are held with Officers and representatives from Finance, IM, Training and Program offices during which the status of various CMAX initiatives are discussed. Changes to the scope and objectives, outside of the currently funded levels would need to be approved by NWA Officers and submitted to Finance for inclusion in the next available budget modification window.

CMAX interfaces with two external applications: First American Credit Reporting system, and the Hope Loan Port. The interface with First American Credit Reporting system existed at the time of purchase and was continued by agreement after purchase, and allows counselors to pull client’s credit report data and scores into the CMAX application. The Hope Loan Port interface is a recent addition and allows counselors to submit mortgage modification requests directly to mortgage servicers.
In order to ensure the accuracy and completeness of data transfers between CMAX and First American Credit Reporting system, CMAX requires the user to enter all required information into the credit request form. A request will not be sent unless all required information is entered. First American Credit Reporting will respond by sending back all relevant credit information related to the client, if available. Additionally, in order to ensure the security of the transmission between CMAX and First American Credit Reporting system, the connection utilizes Secure Sockets Layer (SSL) which ensures the data is encrypted and thus unreadable to outside parties.

In order to ensure the accuracy and completeness of data transfers between CMAX and the Hope Loan Port (HLP), CMAX conducts an automatic review of all data transmitted by the user. If a required data point is missing, CMAX will provide the user with a list of omitted fields and will not transmit the data to HLP. Prior to transmission, CMAX requires the user to review all data that is being transmitted and presents the values to the user for review. Transmittals can occur without some non-required data, but the missing data is clearly presented to the user prior to transmittal. It is up to the user to complete the data in CMAX prior to transmittal, or to ignore the messaging and supplement the data on the HLP post-transmittal. Additionally, in order to ensure the security of transmission between CMAX and the Hope Loan Port, the connection utilizes Secure Sockets Layer (SSL) which ensures the data is encrypted and thus unreadable to outside parties.

As NeighborWorks’ client management system for homeownership services, CMAX has the ability to collect all necessary data points for reporting to the NWA Online Reporting System (ORS), specifically for quarterly Clients & Financing reporting. During the ORS Audit conducted in FY10, we identified two methods of data entry into the ORS: direct manual entry and import from a Microsoft Excel template. CMAX has the ability to export Client & Financing data to the Excel template for subsequent upload to ORS. We found adequate controls in the edit and validation checks listed in the ORS application in that they are enforced regardless of whether the data is uploaded via an Excel template or whether data is directly entered into the ORS system. Thus ORS performs the same data checks, including enforcing certain fields as “required”, on data originating from CMAX as it does for any other data entering the system. Due to the fact that there are many non-NWO users of CMAX, the application needs to stay more flexible than ORS with what fields it “requires” the user to input. Thus, while ORS may require a field, CMAX may not mandate that field as “required”. Through edit & validation checks ORS application ensures those fields were populated before entering the ORS system.

CMAX Policies and Procedures are available to users on the NeighborWorks Members site and the actual CMAX application site. The NeighborWorks Members site contains various documents to assist user organizations in migrating from existing client management systems to CMAX, converting data to CMAX and becoming familiar with CMAX functionality. The CMAX website contains various User Manuals, Training Materials, FAQs and guidance documentation under the Resources tab. Documentation includes specific guidance for Foreclosure Prevention, HUD 9902 Reporting, CARS
Reporting and Credit Reports functionality. User manuals and related documentation serve as in depth reference for users of various skill levels. The actual CMAX User Guide is over 280 pages in length and is filled with screenshots and detailed guidance.

CounselorMax training is offered in both, live computer lab or web-based formats, throughout the year, and is communicated to users on the NW Members Site, and the CounselorMax public site via the CounselorMax Training Schedule, as well as on the Training pages on NW public site for NTI. Among the sessions offered are: Data Management and Tracking with CMAX, CMAX for Decision-Makers and Administrators, New User Overview Sessions, Foreclosure Module Sessions including NFMC compliance, Special Topic Sessions.

Attendees can register online for any of the training sessions. Data Entry, Administration and Reporting are primary components of each of the forms of training. Through offering a diverse menu of training options, dates, mediums and locations, NeighborWorks Center for Homeownership Education and Counseling (NCHEC) provides the necessary user training to ensure proper entry and maintenance of data.

Information Management employs controls to ensure proper change management controls are in place for CounselorMax. A separate production, development and training environment are in place to ensure that development and training activities do not affect the live production environment. IM manages change in the CMAX application through careful communication and tracking with end-users, the business unit, and the contractor developers working on CMAX. The process of change management begins with ongoing input from end-users and the business units regarding features and bugs. Data on desired features and existing bugs in the application is collected from several sources including Help Desk records that are analyzed periodically, as well as a spreadsheet maintained by the project manager. IM has also developed a web based application within the CMAX development system to log and track the status of all outstanding changes to the system.

Help Desk assistance is provided by IM through phone and email support. The goal of the Help Desk is to respond to all user support requests within four business hours. The Help Desk utilizes a support management software application called HelpStar and tickets are documented and assigned to support representatives based on severity-based on a tiered system. The Help Desk software has a full suite of reminder and escalation features to ensure proper and timely responses are provided, or that higher level staff are notified if a response is delayed.

Tier 1 tickets involve standard usability, navigation, configuration, and canned or custom reporting. Tier 2 tickets are advanced configuration issues requiring back-end database access, complex reporting issues, possible bugs or malfunction issues and other issues beyond the expertise of Tier 1 support reps. Tier 3 tickets are verified bugs confirmed by Tier 2 support staff. Tier 3 tickets are assigned to the development team for immediate resolution if deemed critical to reasonable usability of the application, or logged and scheduled for correction during the next planned release. Currently there are
three Tier 1 support staff, one and a half Tier 2 staff, which will be enhanced to two staff
during FY 2011, and the contracted developers at EMTA as Tier 3 staff.

Identification and Authentication to CMAX requires users to input their User Id and
Password, which must conform to strong password standards. Role-based authorization
is then utilized to restrict access to functionality and data within the system. We
reviewed accessibility controls surrounding CMAX.

Currently the CMAX system is hosted in [redacted] by vendor [redacted].
CMAX data is backed up daily via disk-to-disk backup and weekly to an offsite location.
The disaster recovery site is located at a third party facility in [redacted] and is considered a
Cold site, with an estimated recovery time of 1 to 2 days should a disaster occur. NWA
is considering moving to a warm site disaster recovery solution that would have a
recovery time of 2 hours following a business continuity event.

The Office of Financial Planning, Analysis & Contracts, Finance works with IM,
Training and other business units to estimate costs for ongoing support of CMAX. A
consultative cost estimation approach is utilized. Staff costs are estimated by Finance
based on average NWA compensation in consultation with IM or Training as applicable.
Non-staff costs are based on proposed or ongoing vendor agreements such as for
purchase, retainer support, development Statements of Work and the Application Hosting
Agreement. Finance presents a Projected vs. Actual statement at each Monthly CMAX
meeting, whose attendees include IM, Training, COO, Controller and various Program
representatives. If budget adjustments are required, certain windows exist for these
requests to be submitted and approved.

To date, a total of $2.7 million has been spent on costs directly associated with CMAX
acquisition, maintenance, support and enhancement, the bulk of which has been spent on
acquisition for 1 million and professional services fees from FY08 – FY11 totaling
another 1 million. We noted that $725,000 has been spent on salaries related to CMAX
support during this timeframe.

While CMAX does not pay for itself through income derived from licensing fees,
there are strategic benefits to the organization. CMAX is web-based and can be centrally
administered, replacing an aging predecessor NSTEP which required client-side software
that is more difficult to support. Additionally, CMAX continues to allow NWA to retain
control over the client management system and control modification of the system to fit
NWA and NWO needs. The alternative system, HCO is run by a competitor and may not be supported going forward. Currently, HCO has not kept the pace of requirements of reporting and interface with tools, such as Hope LoanPort. Additionally, HCO has other users so NWA’s modification requests would have no guarantee of consideration or timely implementation. Thus, having CMAX provides stability to the client management platform.

Income from license fees is projected to be $125,000 for FY11 while expenses are projected to be $1.36 million3, thus underscoring the need for external funding sources to help subsidize costs. CMAX is a necessary data collection tool for the network. Currently there are approximately 576 organizations paying for CMAX licenses while an additional 372 organizations (NWO, NFMCs) are receiving the service free of charge. Thus, ongoing operations is heavily dependent on NWA appropriated funds as well as funding from other outside sources. Freddie Mac funding through the original agreement at time of purchase ceased to exist on January 1, 2010. Ongoing funding support from Freddie Mac is not guaranteed and thus increasing the number of user organizations paying for CMAX, as well as seeking additional funding sources are options currently being considered by management.

Observations and Recommendations

The following observations and recommendations were noted and should be considered for improving operations, processes and controls related to CounselorMax oversight.

1. While we acknowledge that CounselorMax is part of a budgetary process as was evident in materials obtained for CounselorMax we noted that the concept of integrating capital projects such as CounselorMax into a formalized portfolio of projects a Capital Budget would be an added benefit as a means of further enhancing the budgetary process. While Training and IM in its Road Map plans have made provisions in their budgetary presentations to track these activities independently, developing an overall Capital Budget has the potential of not only furthering accountability, transparency and coordination among the stakeholders charged with development, but also with pre-determining where the corporation intends to be in future years with all such projects.

Recommendation:
We recommend creation of an overall Capital Budget that would integrate capital projects such as CMAX in order to further facilitate enhanced project monitoring and coordination. This would provide the assurance for ensuring that capital projects such as CounselorMax and other like projects are analyzed with appropriate cash flows and financing plans. This would also generate plans for alternative sources of funding to subsidize costs and facilitate planning for adequate resources to meet that purpose.

3 Source: CounselorMax 2011 Budget Hearing Presentation based on a Steady State model projection.
2. While CMAX data is backed up daily via disk-to-disk backup and weekly to an offsite location, a cold-site is available in the event of a disaster. Disaster recovery could be improved by moving to a more real-time disaster solution such as a warm-site. Per inquiry with Information Management, implementation of a warm-site solution has begun and is planned for completion in mid-January 2011.

**Recommendation:**
We recommend continuing implementation of the warm-site disaster recovery solution, to minimize potential down-time in the event of a disaster.

3. CMAX change management procedures should be formally documented and enhanced to include User Acceptance Testing (UAT) and Signoff prior to production implementation of system enhancements. Formalized and documented change management procedures help to ensure only properly authorized changes are made to the system, code or data and that changes are thoroughly tested to ensure functionality and alignment with the original business need.

**Recommendation:**
We recommend documenting a formal Change Management procedure that includes User Acceptance Testing and Signoff prior to production implementation of system enhancements, inclusion of NCHEC in the UAT process, as well as coordination with [Hosting vendor] regarding patch and server maintenance.

A similar recommendation was noted in the September 2010 audit report on the Online Reporting System/ Data Collection Integrity and Analysis review. Management agreed that while change management procedures and controls were in place, the process lacked documentation. IM agreed to document the change management policies and procedures by June 2011.

4. NW lacks a contractual mechanism to hold vendors [Hosting] and [Development] accountable for compliance with Information Security and Change Management policies and procedures. Information Security and Change Management controls are not addressed in the contracts. Additionally, contracts do not provide NWA the right to audit [Hosting] or [Development], nor do they require the vendors to provide an annual Service Auditors Report attesting to the design and operating effectiveness of these controls. Per inquiry with IM, [Hosting] was required to have a SAS70 on file at the time of contract signing.

**Recommendation:**
In the near term, management should consider available options for obtaining assurance that [Hosting] and [Development] comply with NWA
Information Security and Change Management policies and procedures\(^4\). In the long term, vendor agreements should be amended to ensure a right to audit (for compliance) and/or annual Service Auditors Report. Note that effective June 15, 2011, the SAS70 standard will be replaced by standards SSAE 16 and ISAE 3402, and thus Service Auditor Reports will need to be performed and issued in accordance with these new standards.

A similar recommendation was noted in the September 2010 audit report on the Online Reporting System/ Data Collection Integrity and Analysis review. Management noted that the Office of General Counsel, in cooperation with Information Management, will complete a review of hosting and software development contract language to ensure ample considerations have been made for information security and change management controls. Management agreed to implement this recommendation by June 2011.

**Conclusion**

NeighborWorks has made a significant investment of time and funding in the strategic acquisition, maintenance and enhancement of a new web-based client management system, CounselorMax. Formalization of an overall Project Plan is recommended to enhance ongoing project monitoring and coordination for both Training and IM CMAX initiatives. Additionally, improvements to the disaster recovery service should continue to be implemented, to ensure quicker recovery time in the event of a disaster. Change Management procedures should be documented to ensure the formalization of change management controls currently in place. Lastly, improvements in vendor management are required to ensure IT vendors are in compliance with prevailing IT Security and Change Management standards. Having a common data collection tool for Network organizations is highly beneficial for performance and outcome measurement at this time. However management should continue to source other options for subsidizing costs as a way to minimize the full impact of total costs.

We would like to extend special thanks to the Information Management and NeighborWorks Center for Homeownership Education and Counseling (Training) Teams for their diligent assistance during our review.

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\(^4\) Internal audit plans to embark in FY 2011 on a corporate wide review of NWA’s vendor relationships with external partners such as Dynaxys and EMTA with a view to ensuring that certain contractual and monitoring clauses are consistently applied to all EBR’s.
Appendix A
Professional Biography for Audit Consultant

The CounselorMax audit review was conducted by an external IT audit consultant, [name], of [company], an IT audit and assurance consulting company.

The founder [name] began his career as a Consultant at KPMG where he serviced over 35 clients with IT Audit, Security and related services for both external audits and consulting engagements. During his tenure there, he obtained the Cisco Certified Network Associate (CCNA) certification and in his next position as Sr. IT Auditor at CitiFinancial, he obtained the Certified Information Systems Auditor (CISA) certification. His time in an Internal Audit role at CitiFinancial allowed him to obtain a thorough understanding of how to implement control into the technology environment rather than simply analyzing and making recommendations. He was able to coordinate various peer reviews among Citigroup affiliates, migrate the Risk and Control Self Assessment process to a web-based platform, and ensure technology controls were embedded in the business. He left CitiFinancial as Operations Audit Manager.

He moved back into the consulting field and spent nearly two years at Legg Mason, leading their SOX 404 technology compliance efforts. At any given time, he managed up to 12 internal audit and Big 4 consultants to ensure internal SOX compliance audits were performed on time and on budget. He was also responsible for resource planning, budgeting, sampling methodology development, reporting to the Internal Controls Committee and training and mentoring staff.

Now operating as [name] has partnered with CPA firms to provide various internal and external audit services. Along the way he has obtained Secret Security Clearance in order to operate in the Federal Government arena, and has attained the Certified Internal Auditor (CIA) designation which demonstrates technical competence in the field of Internal Audit.

It is with these career experiences, and [his ideals of providing unparalleled dedication and service], that [name] was founded.