

MILWAUKEE COUNTY OFFICE OF THE COMPTROLLER

Comptroller Liz Sumner

MILWAUKEE COUNTY AUDIT SERVICES DIVISION

Jennifer L. Folliard, Director of Audits
Molly Pahl, Deputy Director

County IDs: Progress is Being Made, but Work Remains to Strengthen Security

December 2025

PROJECT STAFF

Audit Team

Lolita Davis-Spears
Sandra Swan
Isaiah Garcia-Morton



Review Staff

Paul Grant, CPA
Bruce Landrum, Jr.

Administrative Staff

Cheryl A. Hosp



Office of the Comptroller
Audit Services Division

Milwaukee County

Jennifer Folliard, Director of Audits
Molly Pahl, Deputy Director of Audits

To the Honorable Chairwoman
of the Board of Supervisors
of the County of Milwaukee

December 18, 2025

We have completed an audit; *County IDs: Progress is Being Made, but Work Remains to Strengthen Security*. We found, as expected due to the timing of our audit, that many policies and procedures are still in development due to the ongoing roll out of the new CCure ID system. The system provides improvements over the 20-year-old BadgePro system primarily due to the inclusion of a daily data exportation from the County's human resources information system which is in Phase One of its deployment. Phase Two will expand the data exportation to include internal transfers and separation status of employees.

As a part of our work, we did a test of the screening stations at the Courthouse and found that our staff was able to bypass screening using other staff's IDs. The Department of Administrative Services – Facilities Management Division is in the process of implementing a pedestal system where IDs would be scanned to verify for active ID status and if bypassing screening is appropriate.

Our report contains 11 recommendations which we believe will help management improve security. Included in the recommendations is the development and issuance of policies and procedures in a variety of areas along with additional mandatory annual training for the staff at the screening stations. In addition, Facilities should provide documentation that Phase Two of the daily data exportation is working as envisioned.

A response from DAS - Facilities and the Office of the Sheriff are also enclosed. We appreciate the cooperation extended by management and staff. Please refer this report to the Committee on Audit.

Jennifer L. Folliard
Director of Audits

JLF/mrp

cc: Liz Sumner, Milwaukee County Comptroller



David Crowley, Milwaukee County Executive
Marcelia Nicholson-Bovell, Chairwoman, Milwaukee County Board of Supervisors
Milwaukee County Board of Supervisors
Mary Jo Meyers, Chief of Staff, Milwaukee County Executive
Kelly Bablitch, Chief of Staff, County Board Staff
Aaron Hertzberg, Director, Department of Administrative Services
Denita Ball, Sheriff, Milwaukee County Office of the Sheriff
Amos Morris, Executive Director, Milwaukee County Zoo
Margo Franklin, Executive Director, Human Resources
Issac Rowlett, Interim Director, Office of Strategy, Performance and Budget
Steve Cady, Research & Policy Director, Office of the Comptroller
Janelle Jensen, Legislative Services Division Manager, County Clerk's Office

Team Invites:

Aaron Hertzberg, Director, Department of Administrative Services
Sean Hayes, Director, Department of Administrative Services – Facilities Management
Division
Dustin Schraeder, Facilities Security Director, Department of Administrative Services –
Services – Facilities Management Division
Andrew Carrion, Public Safety Business Development Analyst, Department of Administrative
Services – Information Management Services Division
Ben Wood, Senior Applications Analyst, Department of Administrative Services – Information
Management Services Division
Brian Barkow, Chief Deputy, Milwaukee County's Sheriff Office
Aaron Dobson, Inspector, Milwaukee County's Sheriff Office



REPORT HIGHLIGHTS

Why We Did This Audit

Concerns were raised during the presentation of our audit report on keycards that similar issues with the County's photo IDs may exist. The County was in the process of implementing a new ID system during our audit. Our goal is to help management identify issues that can be addressed during implementation. The scope of our audit is on the Courthouse Complex and the ID cards which allow for the bypassing of the screening stations.



What We Found

We performed onsite testing of screening stations and were able to bypass security using other staff's IDs. The Sheriff's Office is responsible for staffing the screening stations. There are policies and procedures for their staff, but they do not include guidance on checking if physical attributes match the ID holder. Annual refresher training is not currently provided for the officers who staff the screening stations.

Facilities plans on implementing a pedestal screening system using funding from the American Rescue Plan Act which will require policies and procedures.

The new system import of data under Phase One includes employee names, clock numbers, department name and job title which should resolve issues found in the old system's 37,000 records, however, policies and procedures are still under development. Phase Two will add separation and transfers for employees.

Best practices call for background checks prior to issuances of IDs. The County is compliant for employees. Contractors with after-hours access should have an annual check. The County's current policy is to perform a vendor background check upon ID issuance only.

Human Resources' policy for separation of employees does not state what departments should do with IDs.

In our fieldwork, we had to consult multiple areas of the County to receive answers to our questions and in interviews with ID issuing departments they were asking for direction and policies and procedures.

IDs issued to non-employees including contractors and State employees are problematic due to a lack of data importation which forces a reliance on manual entry and deactivation. Policies and procedures are still under development.

What We Recommended

- The Sheriff's Office should update its policies or training materials to alert PSOs to review physical attributes of the person presenting the ID to match the ID, hold mandatory refresher training for PSOs, and establish policies and procedures for conducting periodic unannounced testing of the screening stations. (Rec. #1 & #2)
- Facilities should serve as the County's overall authority for the new ID system. (Rec. #7)
- Facilities should develop and update policies and procedures for overall system operation (including consideration of the creation of an AMOP), contractor and non-employee ID process, new pedestal system (working with the MCSO), background checks for contractors and the daily data importation. (Rec. #3, #8, #9, #10 & # 11)
- Facilities should provide the Audit Services Division with documentation that the automatic deactivation of separated employees and updating of transferred employees is occurring as planned. (Rec. #4)
- Facilities should develop and document a process to periodically verify that the County's human resources information system data updates are being captured in the new system. (Rec. #5)
- Facilities should work with Human Resources to update the separating employee form. (Rec. #6)



TABLE OF CONTENTS

Page 6	Background
Page 10	Section 1: Test of Screening Stations
Page 14	Section 2: Milwaukee County's Updated Photo ID System for Employees
Page 21	Section 3: Non-County Employee IDs in the New System
Page 26	Exhibit 1: Audit Scope and Methodology
Page 28	Exhibit 2: Response from DAS-Facilities
Page 33	Exhibit 3: Response from the Office of the Sheriff



BACKGROUND

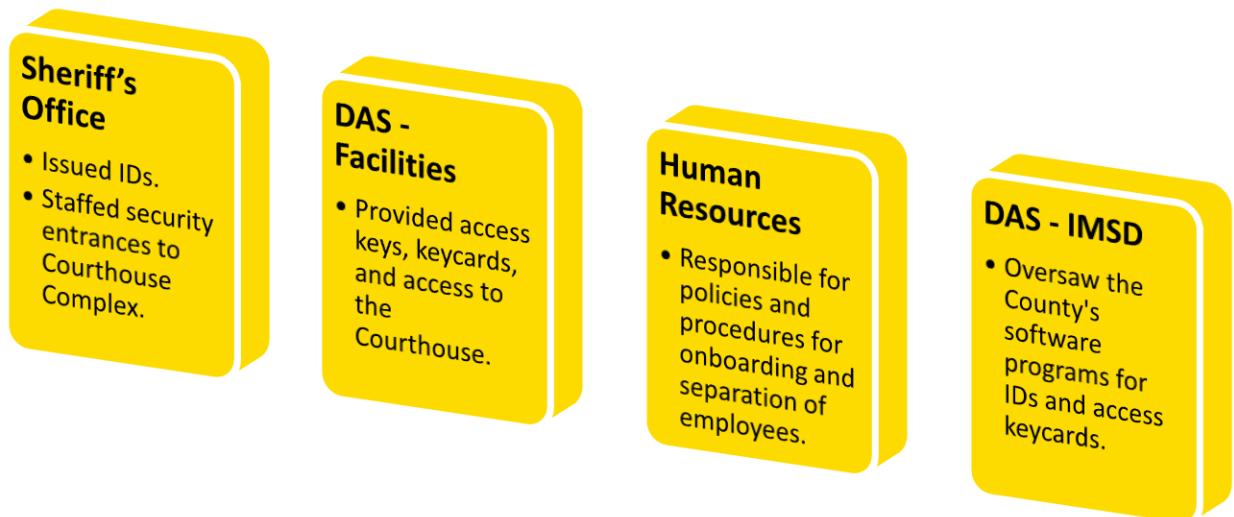
Historically, to enter the County's Courthouse Complex, the public, or those without a County photo ID, are required to go through a security screening station. County employees and other individuals may use an authorized photo ID to bypass the screening station. In addition to photo IDs, employees receive white access keycards to unlock office doors throughout the Courthouse Complex.

In the fall of 2024, the Audit Services Division released an audit report, *Courthouse Access Keycards: Controls Needed to Ensure Keycards are Deactivated When Users Terminate* which reviewed the County's access card program. When presenting the report, concerns were raised that there may be similar issues with the County's photo IDs. The County was in the process of implementing a new ID system during our audit. Our goal is to help management identify issues that can be addressed during implementation. The new system combines the ID cards and the access cards into a single card. The scope of our audit is on the Courthouse Complex and the ID cards which allow for the bypassing of the screening stations.

For more than two decades the County used the BadgePro system for its photo ID program. Under that system, four Milwaukee County areas played key roles:

- The Milwaukee County Sheriff's Office issued all County photo IDs. In addition, the Sheriff's Office has Public Safety Officers (PSOs) who staff the entrances to the Courthouse Complex.
- The Department of Administrative Services - Facilities provided access keys, keycards, and access to the Courthouse Complex before and after normal business hours.
- Human Resources was responsible for policies and procedures for both onboarding and separation of employees.
- The Department of Administrative Services – Information Management Services Division (IMSD) oversaw the County's software programs for IDs.

Figure 1 – County Areas and their Responsibilities in the old system.



Source: Audit created figure based on interviews.



Discussion regarding the security of the Courthouse Complex has been an ongoing topic for many years at the County. Major recent events include in Fall of 2022, the County Board approved a \$3.2 million allocation from the American Rescue Plan Act Funds (ARPA) to fund the Courthouse Complex Security Technology project. In 2023, a new Security Unit was created within the Department of Administrative Services. The 2024 Adopted Budget included language that there will be screening of employees who come into the Courthouse Complex and the Vel R. Phillips Youth and Family Justice Center. The Sheriff's Office indicated it would need to be at full staffing in order to implement the policy and the change could cause delays in entry. In 2025, DAS began the implementation of a new County ID program.

Table 1 contains a recent timeline of developments at the County for the ID programs.

Table 1 Timeline of Major Changes to the County's Photo ID and Access Card System	
Year	County Action
2018	CCURE is implemented at the Zoo as a stand-alone system.
2021	A security analysis conducted by an outside consultant for the Department of Administrative Services – Facilities Management Division contained recommendations including some related to the access and photo ID card system.
2022	In Fall of 2022, \$3.2 million of American Rescue Plan Act Funds (ARPA) were allocated to the Courthouse Complex Security Technology in response to the 2021 security analysis.
2023	The Security Unit within DAS - Facilities Management Division was established to address growing security needs of Milwaukee County. A position of Security Director was created. This position is responsible for unifying security implementation and maintenance.
2024	Audit Service Division released an audit, <i>Courthouse Access Keycards: Controls Needed to Ensure Keycards are Deactivated when Users Terminate</i> which reviewed the County's keycard access program.
2025	DAS - Facilities Management Division began the implementation of the new system at the Courthouse Complex in Summer 2025 which integrates access control cards with Milwaukee County employee photo IDs, allowing personnel to use a single card. Under the new system, the issuance of most IDs will be done by Facilities rather than the Sheriff's Office.
2025	A Security Operations Manager position was added to the Security Unit to support the ongoing security Operations in the Security Operation Center at the new Cogg's Facility.
Mid-2026	Full implementation of the new system will be completed, and the old IDs will no longer be accepted at the Courthouse Complex screening stations.

Source: Audit created table based on interviews, budgets, and prior audit work.



Figure 2 below shows the responsibility of departments using the new system for County IDs.



Source: Audit created figure based on interviews.

In June of 2022, the National Center for State Courts conducted security assessments of court buildings to determine best practices on a comprehensive set of topics for court buildings and court operations. The report discusses that operating a court building is risky by nature and security is a continuous goal that requires attentiveness and a team effort. The guide contains many recommendations on best practices and guidance on what should be included in an entity's policies and procedures to ensure those best practices are being followed.

Security Committee

The National Center for State Courts report calls for the establishment of a building security committee for court buildings chaired by a judge with membership of all stakeholders. Noted stakeholders include county facilities management, the district attorney, the public defender, the state or local bar, probation department, and other non-court tenants. It recommends that the committee initially meet monthly to determine security challenges and suggest solutions.

The State of Wisconsin Supreme Court rules include Chapter 68 – Court Security, Facilities, and Staffing. This rule states that the presiding judge for each county shall appoint a security and facilities committee with members or their designee from the Judiciary, Chairperson of the County Board, County Executive, Clerk of Circuit Court, Sheriff, District Attorney, Public Defender, Court Commissioner, Lawyer, Victim-Witness support organization, and Facilities/Maintenance department. The committee is to meet quarterly and to coordinate and develop general court security and facilities policies and procedures.

Milwaukee County fulfills the recommended practices and the Supreme Court rule. The Milwaukee County Security & Facilities Committee has been chaired by the current Circuit Court Judge since 2017. According to the District Court Administrator, beginning in 2026, the

committee will meet bi-monthly. At the July 8, 2025 meeting, the Facilities Security Director made a presentation to the committee on Complex Security updates including cameras and the new screening and IDs process that was being implemented.



SECTION ONE: Test of Screening Stations

SECTION SUMMARY

The Sheriff's Office Public Safety Officers staff the screening stations and are responsible for verifying IDs for an individual to bypass screening. As a part of our fieldwork, we performed onsite testing and were able to bypass screening using other staff's IDs.

As a part of our fieldwork, we tested the ID review at the screening stations on three separate dates. The testing was conducted at the 9th and 10th Street Courthouse entrances. Testing was conducted during the morning and afternoon to account for busy and slow traffic times and staff wore both casual and business attire.

Auditors used methods such as:

- Covering the face of their own photo on their ID.
- Using other staff's IDs instead of their own including IDs of those with different physical attributes such as gender, race, and age.
- Not clearly displaying their ID.

ASD staff were not stopped by security at any of the screening stations on all three testing dates. Our fieldwork was conducted using the old system issued IDs. Since our office has long been located outside of the Courthouse, staff performing the tests from our office were not likely to be familiar to the Public Safety Officers (PSOs). The new system IDs have smaller photos than the old system IDs and some have unclear photos. Since we used a judgment sample for our testing, the results of the testing may not be universally applied.

The Sheriff's Office is responsible for staffing the screening stations at the Courthouse Complex and has policies and procedures related to the screening stations that may require enhancement.

The Sheriff's Office issued a policy and procedure manual which includes two policies related to the screening stations. One policy, dated December of 2024, provides PSOs guidance in their role and responsibilities while assigned to the Courthouse Complex and the Vel R. Phillips Youth and Family Justice Center and the second, dated October of 2023, provides PSOs guidance in basic operation of the screening stations. PSOs are responsible for maintaining the safety and security of the entrances and exits of the Courthouse Complex and Vel R. Phillips Youth and Family Justice Center.

These policies, shown in Figure 3, state that the PSOs top three listed responsibilities are to operate the screening stations, monitor pedestrian traffic, and verify employees or professional credentials for a person seeking entry.



Figure 3



Source: Audit created figure based on MCSO Policies & Procedures.

In addition, the policy related to the screening stations directs PSOs to allow authorized personnel to bypass screening as long as they present their office identification card and to make sure that the picture on the identification card matches the person presenting the card. The policies do not include items to check for such as matching physical attributes to the presented ID.

The Sheriff's Office provides training to PSOs upon hiring and requires an annual review and certification of policies by PSOs. Annual refresher training for PSOs on screening stations is not currently provided.

According to the Sheriff's Office, all new PSOs receive one-on-one job training for approximately six to eight weeks. When the training officer feels the new employee has demonstrated the ability to perform the full scope of duties, a final assessment is completed and documented. The Sheriff's Office provided an updated copy of the new training assessment for PSOs that included additional evaluation of newly hired PSOs and their checking of IDs at the screening stations.

Annually, all employees are required to review and certify the Sheriff's Office's policies. This is tracked and retained in PoliceOne, the on-line training module utilized by the Sheriff's Office. We reviewed the certifications for PSOs from August 2024 to July 2025 related to the screening stations and found that 30 of the 32 PSOs completed the certification while two did not. When notified of the missing two certifications, the Sheriff's Office corrected it the same day.

The Sheriff's Office was notified of our fieldwork testing results and responded by providing reaffirmation of their policies to their staff.

We met with the Sheriff's Office to update them on the results of our testing of the screening stations. According to multiple emails from the Milwaukee County Inspector after our update, the Sheriff's Office improved their practices and procedures for the PSOs and reaffirmed their policy of physically checking the identification of all individuals who are authorized to bypass security. In addition, the Sheriff's Office noted that they have requested a technological



solution that would include the scanning of IDs upon entry to a device which would then display the cardholder's status and the associated photograph. It was also noted by the Sheriff's Office that human error is always a reality with the current practices and the only solution to realistically solve this issue would be for the County to require physical screening of anyone entering the Courthouse Complex. However, this solution would impact operations and wait times per the Sheriff's Office.

The National Center for State Courts' *Steps to Best Practices for Court Building Security* document provides guidance on governments' badge programs.

Best practices note that access to court buildings should be controlled with an access card or key and that cards be prominently displayed with a photo and identifying information to allow a security officer to confirm if the individual in possession of an ID is in fact the properly authorized holder of the ID. The report calls for the development of policies and procedures and the subsequent enforcement of those policies and procedures.

The report also states that a staff of well-trained Court Security Officers are a necessity for a safe and secure building. It includes both perimeter and interior officers. The report calls for training that is frequent, repetitive, and simple along with regularly scheduled mandatory refresher training.

For Entryway Screening the report recommends policies and procedures that include the following items:

- Who is subject to screening?
- What is the designation of the entrance – public? Staff only?
- What are the duties of the Officers stationed at the screening stations?

While the Sheriff's Office has policies and procedures for the review of IDs at screening stations, the policies do not include discussion of matching physical attributes from the presented IDs to the ID holder. Training is provided for newly hired PSOs but currently there is no refresher training on screening stations offered beyond a verification of acknowledging the policies. Best practices call for mandatory refresher training and our fieldwork showed that, in our sample, the current review of the IDs at the screening stations did not prevent admission by an improper ID holder. The Sheriff's Office indicated while they have conducted onsite testing in the past, it has not been done recently or regularly, therefore we recommend:

1. The Sheriff's Office should include additional direction in its policies or training materials for the screening stations to alert PSOs to review physical attributes of the person presenting the ID to match the ID. Mandatory refresher training should be held for PSOs to align with best practices.
2. The Sheriff's Office should establish a policy and procedures for conducting periodic unannounced testing of the PSO screening stations.

While the new ID system is still being rolled out, additional changes are planned for the system including the installation of a pedestal reader which would align with the 2021 security assessment recommendations.



According to interviews with both the Facilities Security Director and staff from IMSD, the new system will require employees to obtain a new ID every five years. The old system did not have a similar requirement and many employees had IDs that were issued ten or even 20 years prior. It is difficult to ask PSOs to verify that the ID presented matches the person holding it when an individual's appearance can change due to age, hair changes, etc., over a long period of time.

The County's 2021 Security Assessment included a recommendation that Milwaukee County install a proximity card reader at all designated access points that would require every County employee or authorized ID holder to scan in each time they enter any of the designated access points. The recommendation concluded that this would, at the very least, verify that an individual's access card is still valid in the County access control system.

According to the Facilities Security Director, Facilities plans on implementing a pedestal screening system using funding from the American Rescue Plan Act.

According to the Facilities Security Director, a portion of the ARPA funds are allocated towards security upgrades and are currently planned to be used toward the installation of electronic pedestal readers at the entrances. These readers would notify the PSOs at the screening stations if the scanned ID was still active and generate an enlarged ID photo on a screen for the PSO to verify the card belongs to the individual scanning it and that they should be granted access to the Courthouse without being screened.

Facilities received a price quote from their current technology vendor to provide five employee entrance validation readers and associated tablets for viewing credentials status. These employee entrances include two at the Courthouse, two at the Safety Building and one at the Criminal Justice Facility. When an ID is presented to the validation reader, that ID holder's information will be displayed on the screen. The projected cost of the system is \$54,039 based upon an initial quote. Facilities plans to proceed with the project, which is anticipated to be completed by the second quarter of 2026, contingent upon the availability of the vendor to perform the installation.

The proposed installation of a pedestal system would mitigate several ongoing concerns with the County employee ID system including:

- The difficulty in assessing a small photo on an employee ID.
- The use of an expired ID by a former employee or unauthorized user.
- The use of an ID card to bypass screening at the Courthouse by an ID holder not authorized to do so, such as a vendor who works solely at the Zoo.

The installation of pedestal readers that would alert PSOs to expired IDs and populate an enlarged photo for their review would be a big step forward in entrance security, however, the controls still rely on the PSO verifying that the photo on the screen matches the person presenting the ID. The success of a newly added layer of security would also hinge on proper creation, implementation, and periodic updating of policies and procedures for both Facilities and the Sheriff's Office, therefore we recommend:

3. When the new pedestal system is installed, Facilities and the Sheriff's Office should update relevant policies and procedures within six months of installation.



SECTION SUMMARY

In 2025, Milwaukee County began the implementation of its new photo ID system. The new system eliminates many of the data issues we found within the old ID system for County employees; however, policies and procedures are still under development.

Milwaukee County is implementing the new ID system with the intent that it will be the new standard for access control, replacing outdated and fragmented systems. According to management, the key improvements include:

- A unified system, reducing inconsistencies, and improving overall security operations.
- A single card for ID and secure access across the new system-enabled facilities.
- Transition from physical keys to electronic access which enables real-time monitoring, improved auditing, and centralized control of security permissions.

The new system has many upgrades including a daily data export from the County's human resources information system which eliminates a manual entry of information for some fields.

When we began this audit, the County was still using the old ID badging system. We found numerous issues including that the old system had over 37,000 individual data entries spanning back to July of 2001. There was no way to determine inactive or separated individuals from active employees.

We also found:

- Misspellings and typos including misspelled departments and incorrect names.
- Doctors with "Dr." entered in the first name field and their first name being listed as their last name.
- Duplicates.
- Data entries that are missing information.
- Redundant column names.

According to the Sheriff's Office, to issue an ID out of the old system, the information was entered manually and that no action was taken within the system when an ID holder separated. As a result, the system contained ID information from the start of the system in 2001.

In addition, the Department Name field was used for a range of information including County departments, contractors, and private attorney information such as firm name or their State Bar number. We found nearly 4,000 entries within the Department Name field. The issues found included misspellings, variations on department names and inconsistency over using a department's full name such as Zoological Department or using a divisional name such as Zoo-Hospital.

We reviewed Airport entries and found that there were 93 versions for the Airport including:

- Airport
- Aiport



- Airport - DOT
- Airport GMIA
- MCDOT Airport
- MCDOT - Airport

It is common to find these types of data issues when free entry of data is allowed. This results in inconsistencies in data entry which leads to difficulties sorting and analyzing the data.

The new daily data export from the County’s human resources information system includes names, employee clock numbers, department name and job title which should resolve issues involving the multiple versions of departments’ names, misspelling of data and missing data fields.

At the time of our fieldwork, a new system attestation form was being used to issue the IDs to current employees.

In Spring of 2025, Facilities began issuing the new system IDs for the Courthouse Complex. Prior to issuing a new ID, Facilities requires the completion and submittal of an attestation form. The form outlines the responsibilities of the ID holder, including returning the ID upon separation from Milwaukee County. The information required from the ID holder includes name, Milwaukee County ID number which is the County’s human resources information system clock #, name of contracting agency (if contracted), and a signature and date. Figure 4, below, shows the form.

Figure 4



Milwaukee County
CCURE Badge Attestation

Badge holder’s Name: _____ Milwaukee County ID #: _____

If contracted employee, name of Agency: _____

I acknowledge that I have received Milwaukee County employee badge and understand that:

- The badge is property the property of Milwaukee County
- The badge must be worn/displayed during working hours and presented upon request.
- I am responsible for the safekeeping of the badge and must report any loss or damage immediately.
- I am responsible for replacement costs of the badge.
- Upon termination of employment or upon request, I will return the badge to Milwaukee County.
- Misuse or unauthorized use of the badge may result in disciplinary action, up to and including termination.

Employee Signature: _____ Date: _____

Source: Document provided by Facilities.

Our review of the new system found it resolved some of the old system data entry issues.



We reviewed the new system which had 4,938 entries at the time. We found the following improvements in the new system versus the old system:

- Under individual entries, it confirms if profiles are active or inactive.
- Information regarding individuals including job titles and departments that are in the County's human resources information system are automatically populated.
- Employee clock numbers are imported from the County's human resources information system into the new system.
- The new system contains a Clearance Tab which allows departmental staff with permissions to add or remove access to doors. Clearances are a grouping of doors a person has access to.
- Customer Tab has data that shows on the IDs. This tab is used to validate or update data prior to issuing an ID.

We did find some abnormalities within the data in the new system. The oldest card issued from the new system was in October of 2018 but the daily data export from the County's human resources information system did not begin until Spring of 2025. The Facilities Security Director indicated the issues may be due to the issuance of IDs by the Zoo or the Sheriff prior to the interface with the County's human resources information system.

A limited review of data within the new system found that updates from the County's human resources information system, Dayforce, for promoted employees was not captured.

We found that three recently promoted employees within our office were still listed with former job titles in the new system despite being updated in the County's human resources information system. The County's human resources information system shows the promotion date of August 24, 2025, but as of October 9, 2025, the new system did not reflect the new job titles. The Facilities Security Director was unaware of the issue. However, we were informed from IMSD that the daily data export is currently set to only add new staff. During Phase Two of the implementation, updates for promotions and transfers as well as employees who separate will be included in the daily data export. This update is anticipated in early 2026.

The deactivation of employees who separate is a crucial step in the ID process and due to the timing of Phase Two of the implementation of the new system we were unable to test this functionality. In addition, reliance on a daily data export should include a periodic verification, therefore, we recommend:

4. Upon the final implementation of Phase Two, Facilities should provide the Audit Services Division with documentation that the automatic deactivation of separated employees and updating of transferred employees is occurring as planned.
5. Facilities should develop and document a process to periodically verify that the County's human resources information system data updates are being captured in the new system.



Another major upgrade in the new system is the ability for multiple locations to print IDs.

With the old system, all photo IDs were printed by the Sheriff's Office for all users. Under the new system, most employee IDs will be printed at the Security Operations Center at the Cogg building, which falls under Facilities' jurisdiction.

Some buildings in the County do not fall under Facilities purview and those buildings have authority to print IDs for employees, contractors, and other authorized users. There are three areas of the County that print their own IDs: the Zoo, the Milwaukee County Sheriff's Office – Training Academy and the Milwaukee County Sheriff's Office – Criminal Justice Facility. The Zoo has been issuing IDs in the CCURE system since 2018. The Zoo stated that with the Countywide roll out of the new system, their printer was replaced, and the IDs issued with the new printer are of a lower quality. The Zoo noted that blank ID cards are \$11 each and they will destroy some of the IDs due to the photo quality that is printed on the ID.

With the new system, if an employee transfers to a new department, changes to their door access can be updated by the departing department removing access and the new department adding access once the employee has completed the transfer. Authorized users called "operators" can adjust door access. There are 146 total operators in the system with 59 located at the Zoo. Operators may also print IDs if they have access to the system's printer. According to an interview with IMSD, they are in the process of restructuring the printing ability, so that only those with a new Security Role, called a Badging User, will have the ability to print IDs. According to an interview with the Zoo, their printer is located in the Zoo's security office and three users are allowed to print IDs.

Best practices call for background checks prior to issuances of IDs. The County is compliant with this practice.

Background checks are recommended best practices prior to issuing a key or electronic access to any person and include both employees and contractors. This check should be conducted prior to employment. According to the County's Department of Human Resources, it performs a basic criminal background check for all candidates for employment within County departments. The Airport and law enforcement departments require a higher-level clearance compared to other County employees. Beyond the standard criminal background check, the Sheriff's Office conducts a credit history check.

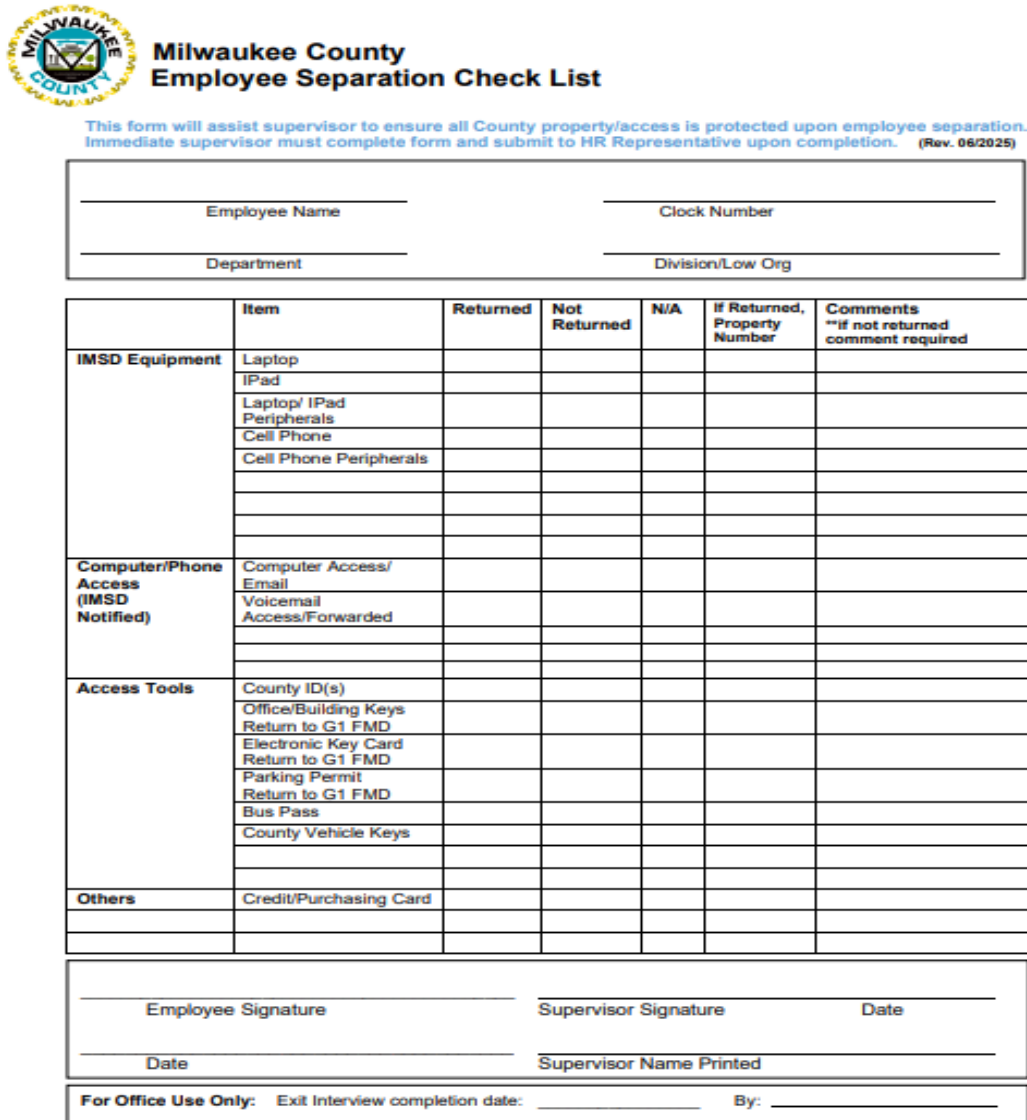
Human Resources' policy for separation of employees notes that employee IDs are to be returned to their managers but does not state what departments should do with the collected IDs.

The Department of Human Resources issued AMOP 02.03.07 which provides the Milwaukee County Employee Separation Checklist that details tasks departments are to complete during employee separation. This list instructs the department to collect the office building keys and electronic keycards from the separating employee and return them to Facilities in G1 of the Courthouse. The instructions do not include direction to the department on what to do with the separating employees' photo ID once collected.



According to Human Resources, when an employee separates, the photo ID is collected by the manager of the departing employee. Figure 5 shows the employee separation list.

Figure 5



Milwaukee County
Employee Separation Check List

This form will assist supervisor to ensure all County property/access is protected upon employee separation. Immediate supervisor must complete form and submit to HR Representative upon completion. (Rev. 06/2025)

Employee Name _____	Clock Number _____
Department _____	Division/Low Org _____

	Item	Returned	Not Returned	N/A	If Returned, Property Number	Comments **If not returned comment required
IMSD Equipment	Laptop					
	iPad					
	Laptop/ iPad Peripherals					
	Cell Phone					
	Cell Phone Peripherals					
Computer/Phone Access (IMSD Notified)	Computer Access/ Email					
	Voicemail Access/Forwarded					
Access Tools	County ID(s)					
	Office/Building Keys Return to G1 FMD					
	Electronic Key Card Return to G1 FMD					
	Parking Permit Return to G1 FMD					
	Bus Pass					
	County Vehicle Keys					
Others	Credit/Purchasing Card					

Employee Signature _____	Supervisor Signature _____	Date _____
Date _____	Supervisor Name Printed _____	

For Office Use Only: Exit Interview completion date: _____ By: _____

Source: Document found on the County’s AMOP website.

The best practices from the National Center for State Courts recommend that when an employee is terminated that their electronic access is deactivated, and their keys are turned in on the last day. These actions should occur before issuance of the last paycheck.

IDs are currently only shown to PSOs to bypass screening at Courthouse entrances. The separation checklist directs departments to collect IDs but does not include direction for where to return IDs. Lacking a verification of the collection of expired IDs could lead to a user with an expired ID bypassing security and entering the Courthouse, therefore we recommend:

6. Facilities should work with the Department of Human Resources to update the form contained in AMOP 02.03.07 to instruct departments to return to Facilities the collected County IDs from separating employees.



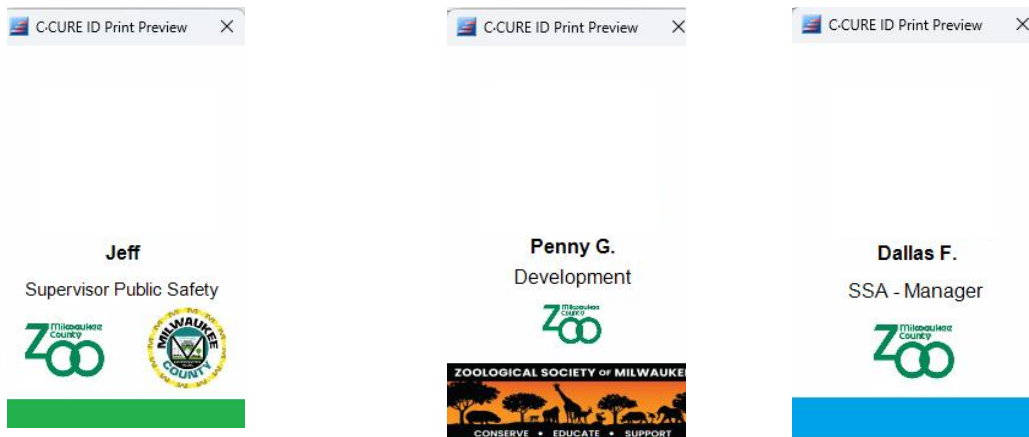
During our fieldwork, we found that we were required to consult multiple areas of the County to receive answers to our questions. We believe there is a need for one entity to be the ultimate authority regarding IDs.

There are three areas currently using the new system to print IDs. IMSD provides technological support. According to interviews with users of the system within the Sheriff's Office, they are looking to IMSD or Facilities to provide them with policies and procedures. The Zoo, who has used the system since 2018, had extensive guides and procedures for their ID area but also expressed the need for Countywide guidance for policies.

The Zoo had a total of 1,273 active IDs in the file they provided to us. Of those, 191 belonged to their food and concession vendor and 611 were listed from the Zoological Society of Milwaukee. Many of the Society IDs that were issued were for volunteers. The Zoo provided screenshots of the IDs that they issue. Employee IDs included the County crest while IDs for contractors, vendors and Zoological Society IDs did not. According to an interview, this was done to differentiate the IDs to limit their use to the Zoo grounds. Examples of the IDs are included below in Figure 6.

Figure 6 Examples of IDs issued by the Zoo for Employees, Zoological Society Members and contractors, and an Employee ID issued by Facilities.

Figure 6



Source: Images provided by the Zoo.



Source: Image provided by Facilities.



It is unclear based upon our interviews whether the policies and procedures under development by the Facilities Security Director will apply to only IDs issued at the Coggs Center or if they will apply to all areas that print IDs.

The National Center for State Courts' *Steps to Best Practices for Court Building Security* recommends that policies and procedures for Employee IDs should cover the following items:

- What are the photo requirements?
- What is the identifying information?
- What are the requirements for displaying on person at security check point?
- What are the procedures for reporting/replacing lost or stolen cards?
- How are the IDs integrated with electronic access cards?

The rollout of the new system was ongoing at the conclusion of our fieldwork and policies and procedures were not completed. An anticipated completion date of the first quarter of 2026 for the Courthouse and second quarter of 2026 for the Safety Building was provided by the Facilities Security Director. Both best practices and internal control recommendations call for the development, implementation, and periodic revision of policies and procedures, therefore, we recommend:

7. Facilities should serve as the County's authority over the new system and apply its policies and procedures at other card issuing locations.
8. Facilities should develop general policies and procedures for Employee ID issuance that align with best practices and distribute to all relevant department personnel within six months of full implementation of the new system at the Courthouse Complex. In addition, a set schedule for periodic review of potential updates should be established.
9. Facilities should evaluate if the policies and procedures should be developed into an AMOP.



SECTION THREE: Non-County Employee IDs in the New System

SECTION SUMMARY

Photo IDs issued to non-employees are problematic due to a lack of auto population from the County's human resources information system and a reliance on manual deactivation based upon notification from entities outside of Milwaukee County.

The District Attorney's Office is a blended staff with both State and County employees who require the new system IDs for their non-County staff. The Public Defender's Office does not contain any County employees but does have State employees who require access to the Courthouse Complex. In addition, there are Judges and Court Reporters who are State employees who work in the Courthouse Complex.

In our audit of access keycards, there were 199 active keycards, or 44%, listed for State employees of the District Attorney and the Public Defender that should no longer have been active. Additional problematic keycards may have existed for judicial staff, but unique access codes were not used for the judicial staff which hindered testing.

At the end of our fieldwork, Facilities informed us that new County IDs had been issued to the District Attorney staff and Judges to allow them to bypass screening when entering the Courthouse. Work had begun on issuing IDs for Public Defenders. Policies and procedures were still being finalized. Based on our prior audit and on preliminary work in this area, there are areas of concern that should be discussed and noted by Facilities as they finish this area of the new system roll out.

Private Attorneys


Attorneys in good standing with the State Bar may apply for a photo ID to bypass screening at the Courthouse. In November of 2024, the Chief Judge issued Chief Judge Directive 24-19, which was a notification of the revision of local rule 1.28 related to Courthouse Security Passes. The Chief Judge, under State Statute, has the authority to prescribe local rules governing practices in the Circuit Court.

The directive states that attorneys in good standing with the State Bar may apply for a photo ID that allows them to bypass the security screening to access the Courthouse. Attorneys may fill out an application to be approved by the Chief Judge along with a \$25 fee. Once approved, the Sheriff's Office prints the ID. An attorney whose privilege to practice law in Wisconsin has been suspended or revoked must return their ID to the Chief Judge.

As shown below in Figure 7, the form asks for identifying information including name, firm/company name, address, a question regarding the good standing of the attorney with the State Bar, height, weight, eye and hair color, a signature, and approval by the Chief Judge's Office. The Milwaukee County Sheriff representative then writes down the date of issuance of the photo ID and signs the form.



Figure 7



Milwaukee County Courthouse Pass
Photo Identification Request Form
FOR ATTORNEYS

New Issue
 Replacement ID Card

Last Name _____ First Name & Middle Initial _____

Firm Name/Company _____ Title _____

Date of Birth _____ Address (Include City, State & Zip Code) _____

Employee Designation:

- Temporary Agency Expiration Date: _____
- Contract Expiration Date: _____
- Citizen Committee Member Expiration Date: _____
- State Employee
- Attorney - State Bar #: _____

For Official Use

Attorney is a member in good standing with the Wisconsin State Bar Association.

Date: _____

Height _____ Weight _____ Eye Color _____ Hair Color _____

Attorney's signature: _____ Approved by Chief Judge's office: _____

Date

Date

To be completed by Milwaukee County Sheriff's Department Representative:

Photo ID Issue Date _____

Sheriff's Department Rep. Signature: _____ Date: _____

Source: Document found within communication from the Chief's Judges Office.

According to the Facilities Security Director, the process for private attorneys' IDs has been established but not yet implemented. Policies and procedures to document the process are being developed.

Contractors

Currently, the Sheriff's Office has an Information Release Authorization form for Contractors to fill out. This form allows the Sheriff's Office to obtain information and records pertaining to the applicant. This form is to be signed by the applicant, as well as a witness to the signing.

According to the Facilities Security Director, the County does not have a master list of contractors, so he has been working with the departments to go over the process and procedure both currently and in the future. The Director said a department head or designated department representative can approve a contractor to get an ID that has already gone through the contractor background check with the Sheriff's Department.

In the future, Facilities will be notified via a system feature that a department is requesting an ID for a contractor. Eventually contractors will be sorted by company name, but they are not in a drop-down menu yet. Each department will have a designated person for the Facilities Security Director to work with if a contractor needs an ID.



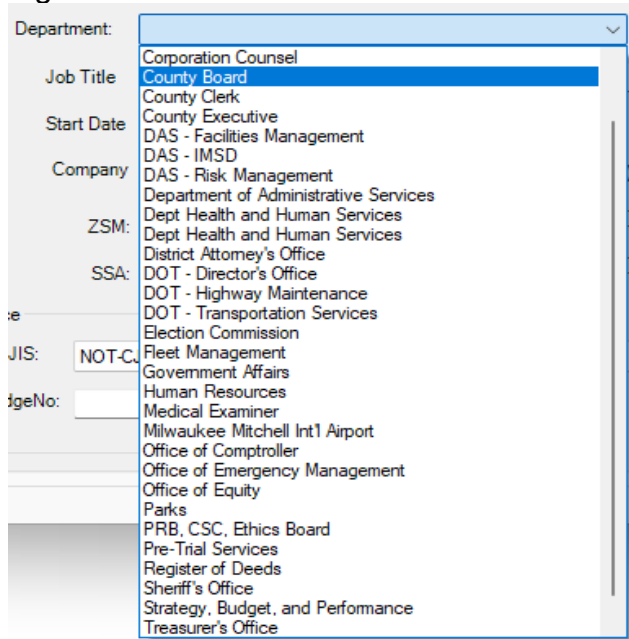
The new system has the potential to include an expiration date for IDs issued to non-employees per interviews with the Facilities Security Director. According to IMSD, there are two types of contractors that are issued IDs. One is those that need access in an on-demand fashion such as a construction worker. This ID would have a one-year expiration. The other is those that are similar to County employees but who work on a contracted basis. These contractors would receive a five-year ID.

The National Center for State Courts recommends that when a contract is terminated all access devices are also immediately terminated. A log and confirmation of the device deactivation should occur prior to the issuance of a final contract payment.

The new system has many upgrades versus the old system, but some IDs will still require manual entries.

The new system does allow for drop down menus to limit free data entry. For the issuance of contractor IDs or other IDs not populated by the daily data export from the County’s human resources information system, some fields will remain manual entries. We noted in the prior system that there were issues with the entry of departmental names which impacted both employees and contractors. The new system allows for a drop-down menu for the department field as shown below in Figure 8 which should resolve the issue.

Figure 8



Source: Document provided by Facilities.

While the new system’s drop-down menu solves the multiple versions of department names, contractor names are still manually entered at this time. In the old system, we found contractors with multiple versions of their company name. As noted earlier, this is common to find with free entry of data especially with a lack of policies on how contractor information

should be noted in the system. As an example of what we found American Family Insurance had seven versions of its name in the system.

- American Family
- American Family Ins.
- American Family Ins-Group
- American Family Insurance
- American Family Mutual
- American Mutual Ins.
- American Family Mutual Insurance

Best practices recommend that policies and procedures should be established for non-employee ID issuance. These policies and procedures should include:

- Who is eligible for a non-employee badge for bypassing screening for entry?
- What type of background checks are required?
- The expiration timeline for the IDs and collection of expired IDs.
- How can a department obtain an ID for a contractor, state employee, or other approved personnel?
- Annual review and revision as necessary.

The issuance of non-County IDs creates several issues within the new system due to manual entry and notification for deactivation. Currently the processes for issuing and terminating these IDs are still being developed, therefore we recommend:

10. Six months after the process to issue non-County employee IDs is finalized, Facilities should issue policies and procedures that address the concern for accuracy of data entered into the new system, the ability to deactivate IDs in a timely manner, and providing for additional parameters for contractors as necessary.

Background checks for contractors are a recommended annual practice.

Background checks are recommended best practices prior to issuing a key or electronic access to any persons\ and include both employees and contractors. This check should be conducted prior to execution of a contract. Cleaning crews and any vendors granted after-hours access should have a background check conducted annually. According to Facilities, the Courthouse has cleaning crews who work after hours.

Currently, the Sheriff's Office conducts a one-time background check prior to the issuance of IDs for contractors at the request of Facilities. The Facilities Security Director indicated that he is working with the DAS Procurement Division to explore if those checks could be conducted by the vendor who currently performs the employee background checks for Human Resources. Discussions on this possible change were ongoing at the conclusion of our fieldwork.

While the County is conducting background checks, policies and procedures have not yet been developed for the new system and there is a potential change being proposed for the background checks, therefore, we recommend:



11. Facilities should develop policies and procedures for background checks for contractor IDs prior to issuance of IDs. In addition, a policy to ensure the background checks are conducted annually for any contractors with after-hours access should be created. These should be completed within six months of the full implementation of the new system at the Courthouse Complex.

EXHIBIT 1 - AUDIT SCOPE AND METHODOLOGY

The objective of this audit was to assess the photo ID process to determine effectiveness of the system in allowing other authorized users to bypass security using an ID. We reviewed the operations of the old system and assessed the possible reoccurrence of issues in the new CCURE system. A review of processes and available policies and procedures was included.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We limited our review to areas specified in this Scope and Methodology Section. During the course of our audit we:

- Obtained and reviewed the confidential 2021 Facilities security review of the Courthouse Complex and Cogs Building.
- Assessed internal controls relevant to the audit objectives. This included the review of policies, procedures, and practices associated with all photo IDs for employees and authorized non-employees. We did not identify any internal control findings.
- Interviewed and corresponded with Department of Administrative Services, Sheriff's Office, Milwaukee County Courts, Zoo, and Human Resources departmental staff, to obtain a clear understanding of the procedures used to issue, update, and terminate photo IDs used to enter the Courthouse Complex.
- Obtained and reviewed the contract for the CCure System and the proposed quote for the additional of the pedestal system.
- Obtained the BadgePro system policies, procedures and processes used to obtain a photo ID badge, including forms used. Reviewed policies and procedures for lost or stolen County photo IDs, separated employees and for transferred County employees.
- Obtained and reviewed the Facilities' Office Administration Procedures, the County's Administrative Manual of Operating Procedures (AMOP) 14.02 – Employee Access Card and Key Issuance and Return, and the County Employee Handbook.
- Reviewed the Department of Human Resources issued Administrative Manual of Operating Procedures (AMOP) 02.03.07 Discharge of Classified Employee, as well as the link within the AMOP, 02.03.07 (b) Employee Separation Checklist.
- Obtained and reviewed policies and procedures of the Sheriff's Office for security screening of photo IDs for County employees, contractors, vendors, State employees,



and district attorney office's personnel who bypass security screening at the Courthouse Complex using photo ID cards.

- Obtained photo ID templates for both the BadgePro and the CCURE system to review any differentiation within the templates for varying levels of ID holders such as employee, contractor, and volunteer.
- Using a judgment sample, conducted Courthouse Security Checkpoint employee photo ID testing to determine if officers stationed at the screening stations were verifying if the ID belonged to the presenter.
- Obtained and analyzed the BadgePro system photo ID data to determine the number of IDs, the accuracy of data within the ID entries and any items that were problematic and should be noted for improvement in the roll out of the new system.
- Conducted a CCure System technical walkthrough and reviewed and analyzed data and screens in CCure System to understand how CCure IDs are generated, how information is imported into the system from the County's human resources information system and if issues found within the old system were corrected.
- Conducted a tour of the New Security Command Center and obtained new CCure photo IDs to review the issuance of IDs for employees and verify the collection of the old IDs from employees prior to the issuance of a new ID.
- Reviewed training data from the Sheriff's Office for PSOs to determine if all Public Safety Officers had completed the annual certification process.
- Conducted internet research to identify studies and audits that provide useful background information, relevant industry standards, performance measures, best practices comparisons, and recommendations concerning building photo IDs.
- Reviewed relevant County Board proceedings, Resolutions, Administrative Manual of Operating Procedures (AMOPs), County Employee Handbook, and budgets, regarding issues, concerns, recommendations, and procedures related to the security of the Courthouse Complex as it relates to the issuance and termination of photo IDs.
- Reviewed prior Milwaukee County audit reports to determine if issues related to the audit objectives are discussed and evaluated if appropriate corrective action was taken by the auditee any recommendations. Reviewed the websites for the Association for Local Government Auditors, the National State Auditors Association, National Association of State Auditors, Comptrollers and Treasurers and Oversight.gov to see if other jurisdictions have conducted similar audits to determine if their audit plans could be useful to this audit.



Exhibit 2

Dustin Schrader
Director of Security
Facilities Management Division
901 N. 9th St.
Milwaukee, WI 53233

December 16, 2025

Jennifer Folliard, Director of Audits

RE: “County IDs: Progress is Being Made, but Work Remains to Strengthen Security” – Audit Report Response

Dear Ms. Folliard:

This letter is in response to your Audit Services Division’s eleven recommendations to address the issues raised in the audit report, County IDs: Progress is Being Made, but Work Remains to Strengthen Security.

We would like to thank Audit Services for this comprehensive review, report, and recommendations. Facilities Management is committed to providing safe and secure facilities for our staff, occupants, and visitors, and we recognize that this is critical for the Courthouse Complex. We are aware there are items that require our attention, and we are moving quickly to address the concerns identified through a combination of new technology implementation and strengthened security processes. Your recommendations are sound and will further strengthen the program as implementation continues.

Facilities Management is continuing implementation of the County ID and access control improvements at the Courthouse Complex. This work includes technology enhancements intended to improve ID verification at employee entry points and strengthen the reliability of credential status information used for screening decisions. Key components of this work are planned to begin implementation in the first quarter of 2026, with completion and stabilization targeted by the end of the second quarter of 2026. As these improvements are put into service, Facilities Management will align supporting procedures and communication, so expectations are clear and consistently applied.

Below are specific responses to the eleven recommendations in the Audit Report.

Recommendation 1

The Sheriff's Office should include additional direction in its policies or training materials for the screening stations to alert PSOs to review physical attributes to verify that IDs match the person presenting the ID. Mandatory refresher training should be held for PSOs to align with best practices.

1. Facilities Management recognizes that the Sheriff's Office is responsible for public safety officer policies, post orders, and training materials related to screening operations. Facilities Management will support the Sheriff's Office as requested, including coordination on how the new entrance validation solution will be used operationally to strengthen ID verification at staff entry points. This solution will be implemented in the first quarter of 2026 and is expected to reduce reliance on small credential photos by displaying credential information and an enlarged photo for review at the point of entry.

Recommendation 2

The Sheriff's Office should establish a policy and procedures for conducting periodic unannounced testing of the PSO screening stations.

1. Facilities Management recognizes that periodic unannounced testing of screening stations is operationally managed by the Sheriff's Office. Facilities Management will support these efforts as requested, including assisting with coordination and use of the new entrance validation solution as an added control point that confirms credential status at entry. The entrance validation solution is scheduled for implementation in the first quarter of 2026.

Recommendation 3

When the new pedestal system is installed, Facilities and the Sheriff's Office should update relevant policies and procedures within six months of installation.

1. Facilities Management will partner with the Sheriff's Office to update relevant procedures tied to the entrance validation reader process within six months of installation. This will include clear operational expectations for the entry stations and defined responsibilities for maintaining the accuracy of credential records and entrance configuration. The planned solution includes five employee entrance validation readers and associated tablets across two Courthouse entrances, two Safety Building entrances, and one Criminal Justice Facility entrance, and the system will display the credential holder's information on screen when an ID is presented.

Recommendation 4

Upon the final implementation of Phase Two, Facilities should provide the Audit Services Division with documentation that the automatic deactivation of separated employees and updating of transferred employees is occurring as planned.

1. Phase Two of the system integration will expand the daily Dayforce data feed to include employee separations and employee transfers to support automatic updates within the access control system. This functionality is anticipated to be fully active by the end of the second quarter of 2026 to ensure the process is operating properly end to end.

To bridge the gap between now and full Phase Two activation, Facilities Management is using weekly termination reports from Power BI to validate separation activity and to support timely deactivation where needed to maintain system accuracy.

Following full activation, Facilities Management will complete validation testing and will provide the Audit Services Division with documentation demonstrating that separated employees are being automatically deactivated and that transferred employees are being updated as intended.

Recommendation 5

Facilities should develop and document a process to periodically verify that the County's human resources information system data updates are being captured in the new system.

1. Facilities Management will document and implement a periodic verification process that confirms HR driven updates are being captured correctly in the new system. This work will be completed by the end of the second quarter of 2026. Until the new system is fully implemented and stabilized, Facilities Management will continue leveraging weekly Power BI termination reporting as an interim control to support ongoing accuracy and timely deactivation.

Recommendation 6

Facilities should work with the Department of Human Resources to update the form contained in AMOP 02.03.07 to instruct departments to return to Facilities the collected County IDs from separating employees.

1. Facilities Management will work with the Department of Human Resources to update the employee separation process so that collected County IDs are returned to Facilities Management for appropriate control, including secure disposition and to reduce the risk of expired IDs being used to bypass screening. This will be completed by March 2026.

Recommendation 7

Facilities should serve as the County's authority over the new system and apply its policies and procedures at other issuing locations.

1. Facilities Management will serve as the County's authority for the new ID system and will implement Countywide standards after completion of the Courthouse Complex rollout. Using lessons learned from the Courthouse campus implementation, Facilities Management will develop and apply consistent requirements across other County card issuing locations, including a controlled process for approving and issuing system credentials for staff who require access to the ID system to perform their job duties. This work is anticipated to be completed by the end of the third quarter of 2026.

Recommendation 8

Facilities should develop general policies and procedures for Employee ID issuance that align with best practices and distribute to all relevant department personnel within six months of full implementation of the new system at the Courthouse Complex. In addition, a set schedule for periodic review of potential updates should be established.

1. Facilities Management will develop and issue standardized policies and procedures for employee ID issuance in the CCure environment, including photo requirements, required identifying information, expectations for displaying credentials at screening points, processes for reporting and replacing lost or stolen cards, and how IDs align with access permissions. These procedures will be distributed to all relevant department personnel and other authorized card issuing locations, and Facilities will establish a recurring review schedule to ensure the guidance remains current as processes and technology continue to mature. This work will be completed within six months of full implementation of the new system at the Courthouse Complex.

Recommendation 9

Facilities should evaluate if the policies and procedures should be developed into an AMOP.

1. As Facilities Management completes and distributes the employee ID issuance policies and procedures for the Courthouse Complex, Facilities Management will evaluate whether the finalized requirements should be formalized as an Administrative Manual of Operating Procedures entry to ensure consistent Countywide adoption and long term governance. This evaluation will be completed within six months of full implementation of the new system at the Courthouse Complex.

Recommendation 10

Six months after the process to issue non County employee IDs is finalized, Facilities should issue policies and procedures that address the concern for accuracy of data entered into the new system, the ability to deactivate IDs in a timely manner, and providing for additional parameters for contractors as necessary.

1. Facilities Management will finalize the process for issuing non County employee IDs and, within six months of that process being finalized, will issue written policies and procedures that establish clear requirements for data entry standards, timely deactivation expectations, and additional controls for contractors where needed.

Recommendation 11

Facilities should develop policies and procedures for background checks for contractor IDs prior to issuance of IDs. In addition, a policy to ensure the background checks are conducted annually for any contractors with after hours access should be created. These should be completed within six months of the full implementation of the new system at the Courthouse Complex.

1. Facilities Management will update contractor badging procedures to ensure background check documentation is verified prior to issuance and to require an annual background check validation for contractors who maintain ongoing access, particularly for those requiring after hours access. This work will be completed within six months of full implementation of the new system and will be coordinated with the appropriate County partners to ensure the standard is enforceable and consistently applied.

Conclusion

Addressing the issues identified in this audit is vital to strengthening security at the Courthouse Complex and ensuring the County's ID program is consistently governed, understood, and applied. The corrective actions outlined in this response establish a practical framework to improve ID verification at entry points, strengthen the reliability and timeliness of credential status updates, and formalize the policies, procedures, and oversight needed as the CCure program matures. By advancing the required technology enhancements, documenting clear issuance and deactivation standards for employees and non County ID holders, and coordinating with County partners on screening operations and background check requirements, Facilities Management will reduce the risk of unauthorized bypass and reinforce safe, accountable operations for County facilities.

Dustin Schrader

Dustin Schrader

Director of Security, Facilities Management Division



SHERIFF DENITA R. BALL

DATE: December 16, 2025
TO: Jennifer L. Folliard, Director of Audits
FROM: Aaron Dobson, MCSO Inspector
RE: MCSO Audit Response of “County ID’s: Progress is Being Made, but Work Remains to Strengthen Security”

The Milwaukee County Sheriff’s Office (MCSO) was asked to submit a response to the Audit Services Division (ASD) regarding the Audit titled, “County ID’s: Progress is Being Made, but Work Remains to Strengthen Security”. This response is solely from MCSO and does not include a combined response to the recommendations from all parties that are noted in each of the recommendations.

The MCSO appreciates the Audit Services Division’s openness during this audit and their efforts to ensure a safe and secure courthouse complex that aligns with our mission and goals. The audit resulted in several findings and recommendations related to MCSO operations at our screening stations in the courthouse complex. Below you will see a list of the recommendations, coupled with our response:

The Audit Division tested the ID review of PSO’s at screening stations on three separate dates using the following methods:

- Covering the face of their own photo on the ID badge.
- Using other staff’s ID’s instead of their own including IDs of those with different physical attributes such as gender, race, and age.
- Not clearly displaying their ID.

ASD staff were not stopped by security staff at any of the screening stations on all three testing dates.

MCSO was advised of the results of this testing shortly after it was conducted, and we do not dispute these allegations. What we can say is that there is no “Fool Proof” manner in which to conduct ID checks, although we have gotten much better since the time of the testing. We have advised staff to stop all employees entering the building and take a closer look at the identification, and to ask for a second form of ID if the picture on the ID does not look like the person presenting the ID. This has resulted in many employees getting new ID cards due to old or faded pictures. It should be noted that the pictures on the county IDs are very small, and it is extremely challenging to confirm identity with any degree of certainty by simply looking at a county ID card.

The best way to ensure that weapons do not get into the facility would be to screen everyone who comes into the complex to include all employees, government officials, and attorneys. We are able to do this, however it would create long lines and wait times. We would need buy-in from all system partners to accomplish this task to include the county executive’s office, the courts, and all other county departments. The implementation of new technology where all employees must scan their ID card to be displayed at a PSO workstation will most certainly enhance our ability to identify staff once it is implemented.

- **Recommendation #1** -*The Sheriff’s Office should include additional direction in its policies or training materials to the screening stations to alert PSO’s to review physical attributes of the person presenting the ID to match the ID. Mandatory refresher training should be held for PSO’s to align with best practices.*

Although our policy does state under PSO responsibilities that they are to, “Verify employee or professional credentials for a person gaining entry” and that they are to “Make sure that the picture on the identification card is that of the person presenting the identification card”, we agree that adding language related to reviewing physical attributes could be beneficial. We will update our policy and add that language accordingly. Additionally, our training forms already include language advising our officers to request a second form of ID if the picture is faded and instruct the employee to get a new one. There are also instructions to seize the ID card if it does not belong to the person presenting it, or if it is expired.

We intend on implementing mandatory refresher training on ID checks in 2026. This requirement will be added to our policy document.

- **Recommendation #2** - *The Sheriff’s Office should establish a policy and procedures for conducting periodic unannounced testing of the PSO screening stations.*

As recommended, we will implement annual testing or “Integrity Checks” in 2026 as well. This requirement will be added to our policy document.

- **Recommendation #3** – *When the new pedestal system is installed, Facilities and the Sheriff’s Office should update relevant policies and procedures within six months of installation.*

We will update our policies and training manual upon installation.

The MCSO appreciates the diligence and professionalism of ASD staff throughout the course of their Audit. We strive on a daily basis to provide a safe and secure environment for all Milwaukee County Employees and the citizens who visit our facilities.

**MILWAUKEE COUNTY
OFFICE OF THE COMPTROLLER – AUDIT SERVICES DIVISION**

As an elected official, the Milwaukee County Comptroller has complete independence in deploying the Audit Services Division to conduct audits involving departments under the executive and legislative branches of Milwaukee County government. The Audit Services Division works to promote efficient and effective program management and to deter future problems by analyzing programs and advising both policymakers and program administrators of ways in which programs can be improved.

Audit Reports are submitted to the County Board of Supervisors and referred by the Chairperson to appropriate committees. Public hearings may be held to discuss issues addressed in an audit report. The findings, conclusions, and recommendations contained in the audit reports are solely those of the Audit Services Division.

Mission Statement - Through independent, objective, and timely analysis of information, the Milwaukee County Office of the Comptroller - Audit Services Division assists both policy makers and program managers in providing high-quality services in a manner that is honest, efficient, effective, and accountable to the citizens of Milwaukee County.

For more information, inquire at the Milwaukee County – Office of the Comptroller – Audit Services Division, 600 Plankinton Ave, Suite 600, Milwaukee, WI 53203, Phone: (414) 278-4206, Website:

<https://county.milwaukee.gov/EN/Comptroller/Reports>



ANONYMOUS • CONFIDENTIAL • IMPORTANT
FRAUD HOTLINE



**REPORT FRAUD, WASTE & ABUSE
BY MILWAUKEE COUNTY EMPLOYEES,
ELECTED OFFICIALS & CONTRACTORS**



IT'S DISHONEST • IT'S UNFAIR • IT'S WRONG

414-93-FRAUD

To report County government fraud, waste or abuse call 414-933-7283 or visit <http://county.milwaukee.gov/Audit/Fraud-Reporting-Form.htm>

