

**Florida Department of Elder Affairs
Office of Inspector General**

**6-Month Follow-up Status for
Auditor General Report No. 2012-135, Consumer-Directed Plus Program, Aging
Resource Centers, and Prior Audit Follow-up**

PROGRAM RESPONSES

INSTRUCTIONS: WRITE YOUR RESPONSE ONLY IN THE HIGHLIGHTED AREAS.

Finding #	1
Finding Title	CDC+ Provider Screenings
Status Date	October 2012
Report Date	March 2012
Contact Person	Marcy Hajdukiewicz
Program/Unit	Division of Statewide Community-Based Services
Phone Number	850-414-2308
Recommendation	We recommend that the Department review CDC+ Program consumer's provider files to ensure that all providers have been subjected to a current background screening that is free of disqualifying offenses. In addition, Department management should more closely monitor staff compliance with Department procedure.
Program Response	The Department will implement the following procedure to address the Auditor General's recommendation. The CDC+ Program Office will ensure, through an internal corrective action plan, that all active CDC+ participants' workers/representatives are appropriately Level 2 background screened and that appropriate management oversight and technical assistance to consultants and consumers is in place.
Current Status	<p>The Department implemented the procedure described above. Specifically, in March 2012, the Department published a training module titled, "Background Screening for CDC+ Employees and Representatives (Department of Elder Affairs only)." The training module provides technical assistance to consultants and consumers regarding the Level 2 background screening process.</p> <p>As of October 2012, with the exception of two representatives, all active CDC+ participants' workers/representatives are appropriately Level 2 background screened. CDC+ has provided the two representatives with written correspondence advising that continuing non-compliance will result in termination from the</p>

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Office of Inspector General**

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Auditor General Report No. 2012-135, Consumer-Directed Plus Program, Aging
Resource Centers, and Prior Audit Follow-up**

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	CDC program. They will continue to receive waiver services, but not the CDC service.
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Auditor General Report No. 2012-135, Consumer-Directed Plus Program, Aging
Resource Centers, and Prior Audit Follow-up**

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Finding #	2
Finding Title	CDC+ Expenditures
Status Date	October 2012
Report Date	March 2012
Contact Person	Marcy Hajdukiewicz
Program/Unit	Division of Statewide Community-Based Services
Phone Number	850-414-2308
Recommendation	We recommend that the Department continue attempts to substantiate the appropriateness of the undocumented payments and proceed with recoupment for the payments made after consumers left the Program. In addition, the Department should remind consultants that invoices and receipts must be retained in accordance with the CDC+ Guidelines.
Program Response	We concur with the Auditor General's recommendation. Discovery of these problems during the performance of the audit prompted management to review current internal processes and external training materials, and to implement a detailed corrective action plan to overcome this finding.
Current Status	In response to this finding, CDC+ implemented a policy whereby cash checks are no longer allowed for new enrollees. In March 2012, the Department published five training modules that addressed aspects of the audit. The training module titled, "CDC+ 101 for Consultants" addresses the Consultant's required review of invoices and receipts. The "CDC+ Consumer/Consultant Agreement" addresses the responsibility of the Consumer to retain receipts and the responsibility of the Consultant to review receipts and vendor invoices. The "CDC+ Cash Receipt Log" also contains instructions for the consumer's retention of receipts. The Department published the "Budget Plan For New Enrollees after 5/1/2012," which no longer includes a monthly cash option.

**Florida Department of Elder Affairs
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Auditor General Report No. 2012-135, Consumer-Directed Plus Program, Aging
Resource Centers, and Prior Audit Follow-up**

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Finding #	3
Finding Title	ARC Consumer Call Tracking
Status Date	October 2012
Report Date	March 2012
Contact Person	Marcy Hajdukiewicz
Program/Unit	Division of Statewide Community-Based Services
Phone Number	850-414-2308
Recommendation	We recommend that the Department implement standardized call type (reason for call) classifications for ARCs to use when recording consumer calls in ReferNET. In addition, the Department should direct ARC staff to use the standard call type classifications and ensure that the call type classification is not left blank. Once the validity and consistency of ReferNET data is corrected, the Department should periodically analyze the ReferNET data as part of its monitoring process to verify whether the ARCs are meeting the statutory goals regarding information, response, and referral of the Department's consumers.
Program Response	The Department of Elder Affairs concurs with the finding. The Department has established a workgroup with ARC representation to address the issues identified by the Auditor General's staff.
Current Status	The ARC Workgroup met on June 5-6, 2012 to discuss standardizing data for the quarterly report submitted to the Department. The group discussed the minimum data requirements for the report and identified consistent ways to address each of them on a state-wide basis. The quarterly report requirements include total number of calls and contacts; service requests and needs of inquirers; and service gaps. The <u>total number of calls and contacts</u> to the Helpline is defined as incoming contacts in the same way as in the MAC report (count of all contacts during the reporting period from individuals seeking information, referral or assistance for themselves or others including telephone calls,

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walk-ins, mail, e-mails or faxes for the entire planning and service area), except that the quarterly report counts only Helpline staff and not all ADRC staff. Service requests and needs of inquirers are defined based on the Taxonomy term used to select a resource on the Search page when a specific resource is provided. So that the needs of each inquirer will be documented for every contact, the group decided to add a set of needs to the "Reason for Contact" list that is based on the 15 AIRS Problems/Needs categories. Service gaps are defined as unmet need and the unmet service is the specific needed. To be consistent, staff must search using a Taxonomy code, then that Taxonomy code can be selected as the unmet need service. Otherwise, typing in a need will result in variations in reports. The group decided to remove other unmet need reasons set for individual PSAs, and only use the following six standard choices statewide. All changes were implemented July 2012 and the October 2012 statewide quarterly report will consist of standard data as defined above.

**Florida Department of Elder Affairs
Office of Inspector General**

**6-Month Follow-up Status for
Auditor General Report No. 2012-135, Consumer-Directed Plus Program, Aging
Resource Centers, and Prior Audit Follow-up**

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Finding #	4
Finding Title	Consumer Enrollment
Status Date	October 2012
Report Date	March 2012
Contact Person	Marcy Hajdukiewicz
Program/Unit	Division of Statewide Community-Based Services
Phone Number	850-414-2308
Recommendation	We recommend that the Department ensure that all consumers are enrolled through the ARCs in accordance with the law. We also recommend that the Department continue to remind ARCs of the contractual timeframes for consumer referral follow-up.
Program Response	The Department of Elder Affairs agrees that the Auditor General's staff has accurately reflected the statutory provisions. The Department will update the Programs and Services Handbook to clearly reflect the role of the ARC in receiving and handling referrals. The Department will evaluate the outsourcing of intake and screening for OAA services with our legal office. If determined necessary, the Department will seek legislative change to the statute that allows for effective streamlining of access to services.
Current Status	The July 2012 Programs and Services Handbook was updated to more clearly reflect the role of the ARCs in receiving and handling referrals. The 14-day follow-up after referral is applicable to the provision of information and assistance, not ARC intake and screening. No statutory change is needed, as outsourcing is addressed in rule.

**Florida Department of Elder Affairs
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**6-Month Follow-up Status for
Auditor General Report No. 2012-135, Consumer-Directed Plus Program, Aging
Resource Centers, and Prior Audit Follow-up**

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Finding #	5
Finding Title	ARC Monitoring
Status Date	October 2012
Report Date	March 2012
Contact Person	Marcy Hajdukiewicz
Program/Unit	Division of Statewide Community-Based Services
Phone Number	850-414-2308
Recommendation	We recommend that the Department's monitoring staff maintain documentation of the monitoring risk assessment process, as well as documentation explaining the rationale for omitting monitoring findings from the monitoring reports.
Program Response	<p>The MQA supervisor will summarize the risk factors identified during each pre-deployment meeting and email identified risks to the group, requesting confirmation, at the conclusion of the meetings. A hard copy of the email and any responses by the group will be placed in the monitoring book. The Bureau Chief will be copied on the email to the administrative assistant who prints the documents that are included in the book.</p> <p>Additionally, the MQA reviewers will forward their completed instruments for their review areas to the MQA supervisor. For any items noted as non-compliant on the instruments, the MQA reviewers will include their recommendations for whether the items are findings or minor non-compliance deficiencies, with explanations for their determinations. The MQA supervisor will meet with the Bureau Chief and appropriate staff to discuss recommendations and explanations of determinations. The final draft report will then be vetted through the management staff for final approval.</p>
Current Status	<p>The monitoring team has implemented the recommendations of the Auditor General report. The current status of the corrective action is as follows:</p> <p>Regarding the risk assessment, at the pre-deployment</p>

Florida Department of Elder Affairs
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6-Month Follow-up Status for
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	<p>monitoring meetings, staff verbally summarizes the risk discussions for meeting attendees. Staff is beginning to consistently follow up by sending this information by email to the meeting attendees. Staff is implementing a tracking system indicating AAA reviews completed and reviews outstanding. The risk discussion summaries are maintained in notebooks in the monitoring unit.</p> <p>Regarding documentation of monitoring results, staff has followed the proposed corrective action for item. For any items noted as non-compliant on the instruments, the MQA reviewers includes their recommendations for whether the items are findings or minor non-compliance deficiencies, with explanations for their determinations. The MQA supervisor meets with the Bureau Chief and appropriate staff to discuss recommendations and explanations of determinations. The final draft report is vetted through the management staff for final approval.</p>
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**Florida Department of Elder Affairs
Office of Inspector General**

**6-Month Follow-up Status for
Auditor General Report No. 2012-135, Consumer-Directed Plus Program, Aging
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Finding #	6
Finding Title	CIRTS Access
Status Date	October 2012
Report Date	March 2012
Contact Person	Steve Grantham
Program/Unit	Information Systems
Phone Number	850-414-2023
Recommendation	To ensure that only authorized users have access to CIRTS, we recommend that the Department establish a process for periodically reviewing user access privileges to ensure that the granted privileges remain appropriate. We also recommend that the Department continue its efforts to timely remove the access privileges of terminating employees.
Program Response	The Department is developing an employee tracking data base application with a direct linkage to the People First system, which is the official repository of personnel actions. In this system, the PAR can be generated on demand and the risk of omission of personnel actions is removed. This system is being developed to include other employee related information such as tracking training, training requirements, and performance evaluations.
Current Status	An employee tracking system linked to People First was never implemented. There has been a change in CIO since the last response was created. The following compensating controls are in place to monitor the personnel actions of the Department so that appropriate user access privileges can be administered. Personnel Action Reports s are issued by HR as required or minimally once each month. All CARES field office managers now have access to close accounts using the online User management Tool.

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Office of Inspector General**

**6-Month Follow-up Status for
Auditor General Report No. 2012-135, Consumer-Directed Plus Program, Aging
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Finding #	7
Finding Title	Security Controls
Status Date	October 2012
Report Date	March 2012
Contact Person	Steve Grantham
Program/Unit	Information Systems
Phone Number	850-414-2023
Recommendation	We again recommend that the Department improve these security controls to more reasonably ensure the confidentiality, integrity, and availability of data and IT resources.
Program Response	The Department is migrating to upgraded technologies which are anticipated to address the concerns identified by the audit team.
Current Status	DOEA workstations and laptops have a password protected screen saver policy that users can not alter. Users are configured as standard users and can only view their own personal files and any shared files and cannot install new programs or features. DOEA laptops and field desktops as well as laptops are configured with full disk encryption with power-on authentication.