

Mission:

To protect, promote & improve the health of all people in Florida through integrated state, county & community efforts.



Rick Scott
Governor

Celeste Philip, MD, MPH
Surgeon General and Secretary

Vision: To be the **Healthiest State** in the Nation

June 18, 2018

Celeste Philip, MD, MPH
Surgeon General and Secretary
4052 Bald Cypress Way
Tallahassee, Florida 32399

Dear Dr. Philip:

Pursuant to Section 20.055(6)(h), *Florida Statutes*, our office is to update you on the status of corrective actions taken since December 19, 2017 when the Office of the Auditor General published its Report Number 2018-071, *Licensing and Enforcement Information Database System (LEIDS)*. Management's assessment of the current status of corrective actions is included in the enclosed document.

Three findings identified in a separate published report were classified as **CONFIDENTIAL** in accordance with Section 282.318(4)(g), *Florida Statutes*. These findings were provided to authorized individuals in a separate update and thus are not included in this update. All non-confidential findings are included in this update.

Six months after publication, management reports some of the corrective actions made in response to recommendations from the Office of the Auditor General have been completed. Four non-confidential corrective actions have been completed and four are still in progress.

If I may answer any questions, please let me know.

Sincerely,

Michael J. Bennett, CIA, CGAP, CIG
Inspector General

MJB/akm
Enclosure

cc: Kathy DuBose, Staff Director, Joint Legislative Auditing Committee
Eric Miller, Chief Inspector General, Executive Office of the Governor
Michele Tallent, Deputy Secretary for Operations
Lucy C. Gee, MS, Director, Division of Medical Quality Assurance
Tony K. Powell, Chief Information Officer, Office of Information Technology
Mark H. Boehmer, CPA, Director of Auditing

Status of Corrective Action Plans



Report Number: 2018-071
 Report Title: *Licensing and Enforcement Information Database System*
 Report Date: December 19, 2017
 Status As Of June 18, 2018

| No. | Finding | Recommendation | Corrective Action Plan | Status of Corrective Action Plan |
|-----|---|---|--|--|
| 1 | Licensing and Enforcement Information Database System (LEIDS) application input edits for ensuring data accuracy and validity need improvement. | Department of Health (Department) management should improve application input edits to ensure the accuracy and validity of LEIDS data. | The Division of Medical Quality Assurance's (MQA) vendor will correct the application input edits on the <i>Owner Information</i> , <i>Maintain Visit</i> , <i>Maintain Inspection</i> , <i>Maintain Inspection Visits</i> , and <i>Complaint and Respondent</i> screens. Changes unique to MQA will require custom development by the vendor. | <p>In progress. MQA System Support staff engaged the vendor and defined the functional requirements needed. Three separate Detailed Business Requirement (DBR) documents were generated. The License Module, Enforcement Module, and Inspection Module DBRs were defined and approved by the business owners. The vendor estimates delivery of changes to the three modules for quality assurance (QA) review by June 18, 2018. Subject to a successful QA review, the changes are scheduled to be implemented by the projected completion date.</p> <p style="text-align: right;">Projected Completion Date – June 29, 2018</p> |
| 2 | During the period July 2016 through July 2017, the Department had not established written procedures for, and had not performed, periodic reviews of LEIDS user access privileges. | Department management should establish and implement procedures for the periodic review of LEIDS user access privileges to ensure that the access privileges are authorized and remain appropriate. | MQA will establish and implement written procedures for conducting periodic reviews of LEIDS user access privileges to ensure access privileges are authorized and appropriate to the user's position description. Additionally, MQA will conduct a review of all active LEIDS user accounts prior to implementing new periodic review procedures. | <p>Completed. MQA established written procedures for quarterly reviews of end user access by management staff. MQA merged the review process into current ongoing data review tasks.</p> |
| 3 | The Department's access control procedures need improvement to better ensure that access privileges granted for LEIDS users are timely deactivated when users separate from employment. | Department management should improve procedures to ensure that the LEIDS user accounts of former Department and service organization employees are more timely deactivated. | MQA will establish and implement procedures to ensure LEIDS user accounts are timely deactivated when users separate from employment. Additionally, MQA will conduct a review of all active LEIDS user accounts to ensure all users are current employees. | <p>Completed. MQA established and implemented procedures to ensure LEIDS user accounts are timely deactivated when users separate from employment. All LEIDS accounts were reviewed, and inactive or invalid accounts were removed. Additionally, all LEIDS user accounts have been set to deactivate after 60 days of non-use.</p> |

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| No. | Finding | Recommendation | Corrective Action Plan | Status of Corrective Action Plan |
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| 4 | Some LEIDS user access privileges did not always provide for individual accountability and were not limited to only what was necessary in the performance of the users' assigned job duties. | Department management should implement effective access controls that limit LEIDS user access to only those access privileges that are necessary to perform the user's assigned job duties, promote an appropriate separation of duties, and provide for individual accountability. | Additionally, MQA will explore connecting LEIDS to a Department single sign-on protocol for authentication in the future, allowing deactivation through normal Bureau of Personnel and Human Resource Management separation processing. MQA will establish review procedures to ensure user access controls to LEIDS are specific to job duties. This will include establishing new procedures for granting temporary access to users who are assigned temporary responsibilities based on the needs of the organization. Additionally, MQA will conduct a review of all active LEIDS user accounts to ensure access privileges are limited to only what is necessary in the performance of the users' assigned job duties. The Department will work with its vendor to establish and implement a means whereby all database administrators (DBAs) access and administrative changes can be attributed to a single DBA. | The vendor verbally confirmed single sign-on integration is possible; however, given that the implementation of single sign-on has Department level implications and the Office of Information Technology (OIT) standards must be adhered to, MQA determined the scope of this effort was not feasible for completion this fiscal year. MQA will pursue the implementation of single sign-on in FY 2018-19. However, non-automated measures will continue to be maintained to ensure timely deactivation of access privileges. In progress. MQA is working to establish new roles within LEIDS relative to users' access required to complete assigned tasks. This effort was delayed. MQA has recently had limited access to reports, which are a core component of MQA's many business processes. Projected Completion Date – June 29, 2018 |
| 5 | The Department did not maintain complete and accurate LEIDS access authorization documentation, thereby limiting management's assurance that LEIDS user access privileges were authorized and appropriately assigned. | Department management should improve controls to ensure that access privileges are only granted pursuant to appropriately completed and approved access authorization forms and require that such forms be retained. | MQA will review existing procedures to ensure user access controls to LEIDS are specific to job duties and only granted when the appropriate form is received by the System Support Services staff and authorized by management. This will include establishing procedures for granting temporary access to users who are assigned temporary responsibilities based on the needs of the organization. Additionally, MQA will conduct a review of all active LEIDS user accounts to ensure LEIDS user access privileges are limited to what the user needs to perform assigned job duties and to verify appropriate authorization form was received and retained. | In progress. Once new user roles are established and implemented, new authorization forms will be created and generated for new and existing users converted from the legacy system. Projected Completion Date – June 29, 2018 |

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| 6 | Some Department configuration management controls need improvement to ensure that authorization, testing, and approval activities for LEIDS program and data changes are documented and that changes are moved into the production environment by appropriate personnel. | (6.1) Department management should improve LEIDS application program and data change management procedures to ensure that all program and data changes moved into the production environment are properly authorized, tested, and approved. | (6.1) MQA and the OIT/MQA Application Development Section will evaluate existing Change Management Procedures and develop a user guide to ensure any program or data changes moved into the production environment are properly authorized, tested, and approved by the appropriate business owner and proper documentation is retained. This will include training appropriate staff on the change management procedures. | (6.1) Completed MQA evaluated and updated <i>Change Management Procedures</i> . A user guide was developed to ensure any program or data changes moved into the production environment are properly authorized, tested, and approved by the appropriate business owner and proper documentation is retained. |
| | | (6.2) Department management should ensure that data changes are not moved into the production environment by the programmer who made the change. | (6.2) The OIT/MQA Application Development Section will establish and implement written procedures to ensure data changes are not moved into the production environment by the programmer who made the change. | (6.2) Completed. <i>MQA OIT Support Team Interoffice Procedures</i> issued in May 2018 states “Developers and DBAs must not promote their own changes to production, peer reviews must be conducted and all promotion of code shall be done independently from the developer or DBA who made such changes.” |
| 7 | Certain Department security controls related to user authentication, logging and monitoring, and the protection of confidential and exempt data for LEIDS and related information technology (IT) resources need improvement. | To ensure the confidentiality, integrity, and availability of LEIDS data and related IT resources, Department management should improve certain LEIDS security controls related to user authentication, logging and monitoring, and the protection of confidential and exempt data. | MQA will improve certain LEIDS security controls related to user authentication, logging and monitoring, and the protection of confidential and exempt data. | In progress. MQA acquired and is testing security technology that allows the implementation of both event logging and data encryption. Projected Completion Date – October 6, 2018 |