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Melinda Miguel
State of Florida Chief Inspector General
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PL-03 The Capitol, 400 South Monroe Street
Tallahassee, FL 32399-0001

Subject: Six-month status update, Auditor General Report 2025-112; State Nursing Home and Domiciliary Admissions and Information Technology Controls Audit.

Dear Ms. Miguel:

This letter is to provide you with the six-month status update, pursuant to Florida Statute 20.055(6)(h), of the Florida Department of Veterans' Affairs' (FDVA) corrective actions to the findings of the Auditor General Report 2025-112, State Nursing Home and Domiciliary Admissions and Information Technology Controls Audit. Please contact me if you should need any further information.

Sincerely,

David M. Marzullo
Inspector General

Cc: Joint Legislative Auditing Committee

Finding 1: Nursing home and Domiciliary processes for, and records related to, admissions need improvement to better demonstrate that residents are admitted in priority order and in accordance with applicable requirements.

- See attached report for details.

Recommendation: We recommend that Department management ensure that nursing home and Domiciliary process and recordkeeping controls are enhanced to ensure that resident admissions are made in accordance with priority requirements and applicable State law, Federal regulations, Agency rules, and Department policies and procedures. Additionally, we recommend that Department management update admissions policies and procedures to specify the types of acceptable documentation of proof of State residency.

Agency Response/Corrective Action Plan:
Homes Response: All admissions staff have been comprehensively trained on the regulations governing admissions to the SVNH, including laws related to resident eligibility, prioritization, and legal protections. The admissions checklist has been thoroughly reviewed and will be updated as necessary to align with current regulatory requirements and best practices. Staff have also been retrained on accurately completing and maintaining a prioritized waitlist, ensuring that completed applications are given consideration, and are admitted based first on their service-connected level, followed by medical and other relevant needs that the facility can safely accommodate, in accordance with accepted criteria from CMS, AHCA, and the VA.
To ensure ongoing compliance, the Deputy Director of Service Operations will conduct quarterly audits and use monitoring systems to verify that the admissions process remains consistent with all applicable laws, regulations, and organizational policies.

Agency 6 Month Follow-up Response/Corrective Action Plan:
Homes: Training and Quarterly Audit were completed to verify admissions process remains consistent.

Finding 2: Department controls over the collection of nursing home and Domiciliary resident social security numbers need improvement to demonstrate compliance with State law.

- See attached report for details.

Recommendation: We recommend that Department management ensure that nursing home and Domiciliary SSN collection activities are reviewed pursuant to State law and all admissions forms that collect resident SSNs comply with statutory requirements for collection and use..

Agency Response/Corrective Action Plan:
Homes Response: To ensure compliance with Florida Statute Section 119.071(5) regarding the collection and use of Social Security Numbers (SSNs), the FDVA Homes Program has thoroughly reviewed its admissions process. Admission forms have been updated to clearly state the purpose of collecting SSNs, specify how the information is used, and confirm that SSNs are

only obtained when legally required. These updates also include enhanced privacy statements emphasizing the confidentiality and protection of applicants' data.

In addition, admissions staff have been trained on proper SSN collection practices in accordance with the statute's requirements, including legal obligations and guidelines for safeguarding sensitive information. All updates, procedural changes, and training sessions will be fully documented to demonstrate compliance and to provide a reference for future audits..

Agency 6 Month Follow-up Response/Corrective Action Plan:
Homes: Staff have been trained and admission forms have been updated to clearly state the purpose of collecting SSNs, specify how the information is used, and confirm that SSNs are only obtained when legally required. These updates also include enhanced privacy statements emphasizing the confidentiality and protection of applicants' data.

Finding 3: Department controls over employee access to the Florida Accounting Information Resource Subsystem, MatrixCare, and the Department network need improvement to help prevent any improper or unauthorized use of access privileges.

- See attached report for details.

Recommendation: We recommend that Department management enhance IT user access privilege controls to ensure that Department records evidence:

- The authorization of all IT access privileges and the conduct of periodic reviews of the appropriateness of all assigned network and MatrixCare user access privileges.
- The immediate deactivation of network, FLAIR, and MatrixCare user access privileges upon a user's separation from Department employment.

Agency Response/Corrective Action Plan:
IT Response: FDVA IT department has completed replacing on-prem equipment with a cloud-based solution consisting of new Active Directory and ICAM solutions. This includes new security and auditing functions that log not only ICAM changes but also Microsoft SharePoint, Exchange, Teams, and other Microsoft 365 applications. The new auditing capabilities allow much more granular reporting options then previous systems. FDVA IT has enhanced the network access request process by requiring all activity to be processed through an online form forcing more accuracy and the ability to ensure all requests are properly logged and stored in our ticketing system. FDVA IT has Implemented policy 5030.622 Enterprise Data Strategy and Governance. This outlines our EDSG framework, stakeholders, and responsibilities moving forward. Each Business Unit is responsible for selecting Data Stewards that are responsible for both ICAM access changes and periodic access reviews. FDVA IT is still the responsible party for network access and SSO solutions but inquiries regarding systems that are SaaS based or run by other government agencies with separate access management such as FLAIR and MatrixCare will need to be directed to the correct business unit for accurate responses. Due to the small size of the IT department, we are having to automate as much as possible and will be minimizing

manual audits.

Fiscal Response: Fiscal is responsible for FLAIR. It is the supervisor's responsibility to let fiscal services - financial management know when to set employee's up with FLAIR access and when to remove employee's FLAIR access upon termination or employee no longer needing the access for their position. Since that rarely happens, fiscal services – financial management runs a separated employee report from PeopleFirst every Tuesday per SOP#40-607 which was updated 3/4/21, however, if the separated employee is not inactivated in PeopleFirst immediately then the PeopleFirst reports are not accurate. At that time, the report is compared to employee's who have FLAIR access and remove access from separated employee's who have access. If the person is on vacation the report is ran the following Tuesday.

Agency 6 Month Follow-up Response/Corrective Action Plan:
Homes: Concur with IT and Fiscal Responses.

Fiscal: Fiscal Services confirms that actions to enhance FLAIR user access controls are being implemented in accordance with SOP #40-607. Access authorization forms are completed and retained for all users. Financial Management performs weekly reviews of the PeopleFirst separated employee report, which are now reconciled monthly to the FLAIR active user access report. Access is promptly removed or updated for separated employees or staff who no longer require access. Supervisors remain responsible for notifying Fiscal Services of access changes related to new hires, separations, or changes in job duties. Collectively, these controls provide appropriate authorization, ongoing monitoring, and timely deactivation of user access.

IT: The "Deactivation and Account Deletion Procedure" has been created to standardize account access removal. Network access is granted or removed by IT when a network access form is completed and documented in the ticketing system. SSO implementation is complete for Matrixcare and most SaaS applications. User Access to SaaS or Sharepoint resources is controlled by the departmental data stewards. Questions about Matrixcare logs and user deletions will need to be directed to the Homes department.