



State of Florida  
Department of Children and Families

Rick Scott  
Governor

Mike Carroll  
Secretary

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**DATE:** April 26, 2018

**TO:** Mike Carroll  
Secretary

**FROM:** Keith R. Parks  
Inspector General

**SUBJECT:** Six-Month Status Report for Auditor General Report No. 2018-013

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In accordance with Section 20.055(6)(h), Florida Statutes, enclosed is our six-month status report on Auditor General Report No. 2018-013, *Department of Children and Families, Substance Abuse and Mental Health Information System (SAMHIS), Operational Audit.*

The Substance Abuse and Mental Health (SAMH) Program provided the update, which indicates that the recommendations to Findings 1, 3, and 4 have been fully implemented. The update indicates that recommendations to Findings 2 and 5 have been partially implemented.

If I may be of further assistance, please let me know.

Enclosure

cc: Eric Miller, Chief Inspector General, Executive Office of the Governor  
Kathy DuBose, Staff Director, Joint Legislative Auditing Committee  
David Fairbanks, Deputy Secretary  
Jessica Sims, Chief of Staff  
John Bryant, Assistant Secretary for Substance Abuse and Mental Health

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Mission: Work in Partnership with Local Communities to Protect the Vulnerable, Promote Strong and Economically Self-Sufficient Families, and Advance Personal and Family Recovery and Resiliency

**OIG – Internal Audit**  
**Corrective Action Status Report**  
**Substance Abuse and Mental Health**  
**Information System (SAMHIS)**  
**Report No. 2018-013, Issued August 11, 2017**  
**As of April 25, 2018**

<b>Findings</b>	<b>Recommendation</b>	<b>Auditee Response</b>	<b>Corrective Action Status</b>
<p>Finding 1  SAMHIS application input edits for ensuring data accuracy and validity need improvement.</p>	<p>Recommendation 1:  We recommend that Department management continue efforts to implement necessary application input edits to ensure the accuracy and validity of SAMHIS data.</p>	<p>The audit determined that SAMHIS data entry screens and File Transfer Protocol data submission processes allow for data values outside of standard ranges such as invalid times or terminating dates that precede initiation dates. The Department will include the deployment of the Master Client Index (MCI) process, planned enhancements to SAMHIS, and incorporate additional validation rules in FASAMS. The MCI process will assign a unique identifier (UID) to each person served by SAMH funds based on proven methodologies built into the Department's Office of Economic Self-Sufficiency's FLORIDA system. As of July 1, 2017, over four million UIDs, out of an approximate total of five million, have been assigned to SAMHIS demographic records via the MCI process. An additional one million demographic records are anticipated to be resolved by October 31, 2017 once an automated UID process is deployed. Data validation edits to SAMHIS to prevent problems identified during the audit are being reviewed and prioritized for development either in SAMHIS or in FASAMS.</p>	<p><b>Fully Implemented</b>  Data validation edits to SAMHIS to prevent problems identified during the audit are being prioritized for development in FASAMS.   Reports have been written that identify data exceptions. Subject matter experts follow-up with data submitters to advise on data exceptions.   MCI process has resolved the identity of 4.8 million individuals in SAMHIS. Additional 200,000 individuals are being prioritized and manually resolved.</p>

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<p>Finding 2</p> <p>SAMHIS did not facilitate reconciliations of client service data to the associated expenditure data recorded in the Department's and Behavioral Health Managing Entities' accounting records.</p>	<p>Recommendation 2.a.:</p> <p>To facilitate the reconciliation of client service data to the associated expenditure data in FLAIR and ME accounting records, we recommend that Department management consider the service and payment reconciliation issues as part of the FASAMS Project.</p> <p>Recommendation 2.b.:</p> <p>Additionally, we recommend that Department management develop procedures for reconciling client service data with the associated FLAIR expenditure data and also establish guidelines for ME use when reconciling ME accounting records to SAMHIS data.</p> <p>Recommendation 2.c.:</p> <p>Department management should also require that Department staff periodically review documentation of the ME-prepared reconciliations to ensure that the reconciliations are appropriately and timely performed.</p>	<p>As indicated in this report, finding No. 2 is similar to finding No. 6 contained in the March 2015 Operational Audit Report No. 2015-155, Oversight of Substance Abuse and Mental Health Services. Functionality to define core business rules for linking services and financial data will be added to the future FASAMS system, and complete documentation will be provided to the Managing Entities (ME) and other data submitters to ensure financial and service accountability.</p> <p>In the interim, the Department has added functionality to both its existing data collection and expenditure reconciliation models. SAMHIS functionality has been expanded to better connect SAMHIS collected service/encounter data with financial data from internal and external data systems. Simultaneously, supporting documentation for the Managing Entity monthly invoicing and year-end reconciliation process has been expanded to capture provider-level detail connecting service events to fund sources. While this approach still requires a manual reconciliation of reports generated across multiple systems, it provides significant additional validation pending the implementation of an integrated data and financial management system.</p> <p>The Department will establish procedures to conduct monthly reviews of ME expenditure data through the Department's financial accountability office and will directly incorporate SAMHIS service event data from the MEs for validation and reconciliation.</p>	<p>Partially Implemented</p> <p>SAMH continues to provide monthly reports to regions and MEs that includes counts of persons served and units of services provided. More robust reports are being proposed for FASAMS.</p> <p><b>Anticipated Completion Date:</b> January 1, 2019</p>

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<p><b>Finding 3</b>  The Department had not established procedures for periodic reviews of SAMHIS user access privileges and did not perform such reviews during the period July 2016 through April 2017.</p>	<p><b>Recommendation 3:</b>  We recommend that Department management establish and implement procedures for the periodic review of SAMHIS user access privileges to ensure that SAMHIS user access privileges are authorized and remain appropriate.</p>	<p>By the fifth working day of each month, ME Data Liaisons will check the roles of their staff and subcontractor staff with SAMHIS access to ensure that continued SAMHIS access is needed, and that roles are appropriate for the employee's current job responsibilities. Using an Ad Hoc Active User Report to check the last SAMHIS login date for all staff and subcontractor staff, the Data Liaison shall complete a Database Access Request Form requesting deactivation for each user with 60 or more days of SAMHIS inactivity, and submit the form to the SAMH Data Unit by the tenth of each month.</p>	<p><b>Fully Implemented</b>  SAMH HQ personnel and region/ME personnel have been working in partnership to implement the corrective action. Since this issue was identified, SAMH and MEs have deactivated individuals that have not used the system within 60 days.</p>
<p><b>Finding 4</b>  The Department's access control procedures need improvement to better ensure that access privileges granted for users of SAMHIS and the Department's network are timely deactivated when users separate from employment.</p>	<p><b>Recommendation 4:</b>  We recommend that Department management improve procedures to ensure that the SAMHIS and network user accounts of former employees are timely deactivated.</p>	<p>To ensure that SAMH headquarters employee SAMHIS access is revoked upon separation, the SAMH Human Relations liaison will email the Data Unit security staff at least one day prior for all anticipated separations. For unanticipated separations, the SAMH Human Relations liaison will email the Data Unit security staff as soon as separation has been completed. In both cases, the employee's SAMHIS and network access will be revoked immediately following notification.</p>	<p><b>Fully Implemented</b>  The corrective action has been implemented such that all anticipated separations, as reported by the HR liaison, are closed out of SAMHIS at least one day prior to separation.</p>

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<p>Finding 5            Certain Department security controls related to user authentication, logging and monitoring, and the protection of confidential and exempt data for SAMHIS and related IT resources need improvement.</p>	<p>Recommendation 5:            To ensure the confidentiality, integrity, and availability of SAMHIS data and related IT resources, we recommend that Department management improve certain SAMHIS security controls related to user authentication, logging and monitoring, and the protection of confidential and exempt data.</p>	<p>The audit revealed that the SAMHIS security controls need improvement and provided recommendations on how to improve the security of SAMHIS data. The Department agrees with the findings. The Department is evaluating which solutions will be implemented in SAMHIS and which will be incorporated into the future FASAMS system.</p>	<p><b>Partially Implemented</b>            Role based security was discussed with the FASAMS development team during the week of March 19. Additional discussions were scheduled to be held through mid-April. The FASAMS developer understands the importance of user authentication, logging and monitoring, and the protection of confidential and exempt data. FASAMS is being explicitly designed to ensure that the findings associated with SAMHIS are all appropriately addressed and mitigated.  <b>Anticipated Completion Date:</b>            January 1, 2019</p>