



**State of Florida  
Department of Children and Families**

**Rick Scott**  
Governor

**Mike Carroll**  
Interim Secretary

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**DATE:** October 2, 2014

**TO:** Mike Carroll  
Interim Secretary

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

A handwritten signature in blue ink, appearing to read "KPA".

**SUBJECT:** Six-Month Status Report for Auditor General Report No. 2014-143

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In accordance with Section 20.055(5)(h), Florida Statutes, enclosed is our six-month status report on Auditor General Report No. 2014-143, *Florida Safe Families Network (FSFN), Information Technology Operational Audit*.

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

Enclosure

cc: Kathy DuBose, Staff Director, Joint Legislative Auditing Committee

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1317 Winewood Boulevard, Tallahassee, Florida 32399-0700

Mission: Protect the Vulnerable, Promote Strong and Economically Self-Sufficient Families, and Advance Personal and Family Recovery and Resiliency



OFFICE OF INSPECTOR GENERAL

Mike Carroll  
Interim Secretary

*Enhancing Public Trust in Government*

Keith R. Parks  
Inspector General

Project #E-1314DCF-033

October 2, 2014

**Six-Month Status Report**  
***Florida Safe Families Network (FSFN)***  
***Information Technology Operational Audit***

**PURPOSE**

The purpose of this report is to provide a written response to the Secretary on the status of corrective actions taken six months after the Auditor General published Report No. 2014-143, *Florida Safe Families Network (FSFN) Information Technology Operational Audit*.

**REPORT FINDINGS, RECOMMENDATIONS, STATUS & COMMENTS**

The Offices of Information Technology Services and Child Welfare jointly provided updated status and corrective action comments to findings and recommendations numbers 1, 2, 3, 4, 5, 6, 7 and 10. The Office of Child Welfare was responsible for providing updates to numbers 8 and 9. Presented below are the full text of the Auditor General's finding statements and recommendations, and up-to-date corrective action comments and status, as reported by the management staff of the aforementioned programs.

**FINDING NO. 1:** *The access privileges of some FSFN users were not appropriate for their job responsibilities or were no longer needed.*

**RECOMMENDATION:** *The Department should limit user access to data and IT resources to only access privileges that are necessary to perform job responsibilities and to promote an appropriate separation of duties. Additionally, the Department should ensure that the access privileges of former employees are deactivated in a timely manner.*

**Status (per Offices of Information Technology Services/Child Welfare staff):** *In Progress*

In conjunction with the Office of Child Welfare, Family and Community Services – Information Technology (FCS-IT) is facilitating an access control workgroup to consider the adequacy, understanding, and uniformity of the access control policy and procedures regarding FSFN. The workgroup will consider whether a FSFN-specific policy is recommended to define the Department's approach to managing access controls for current, new, and transitioning users. The workgroup will make recommendations on the scope and frequency of a regular audit process to ensure consistent and appropriate within the established policy. Finally, the workgroup will consider the most effective mechanisms to maintain an adequate understanding of the FSFN access control policy throughout the diverse FSFN user base.

Also, in conjunction with the Office of Child Welfare, FCS-IT is pursuing a Legislative Budget Request (LBR) for funding, beginning July 1, 2015, to support an assessment of the Department's and Community Based Care organizations' compliance with federal, state, HIPAA, and social security rules for protecting personal information; identifying any needed Department policy changes; and defining the roadmap for bringing the Department and its providers into compliance with these policies and regulations, if applicable. The funding will also support quarterly monitoring of FSFN users to verify correctly assigned security profiles.

The anticipated completion date is December 31, 2015, to include the LBR and legislative process.

**FINDING NO. 2:** *Authorization documentation for FSFN access privileges for some users was missing and, in some instances, the access control documentation was incomplete and inaccurate.*

**RECOMMENDATION:** *The Department should maintain documentation of management's authorization for user access privileges and also maintain complete and accurate access control documentation.*

**Status (per Offices of Information Technology Services/Child Welfare staff):** *In Progress*

The Department will improve its FSFN system user account management procedures by:

- Updating procedures that will outline how forms are to be accurately completed and standardize how forms are maintained.
- Creating a procedure to take a semi-annual random sampling of access authorization forms from each regional office and headquarters to ensure policy guidelines on completion, accuracy, and maintenance are being followed. A formal report will be developed for management on findings that do not comply with the developed policy and procedures for access authorization forms.
- Creating a secured location within the Department network for all access authorization forms to be stored electronically.

The anticipated completion date is December 31, 2014.

**FINDING NO. 3:** *The Department's periodic review of FSFN access privileges needed improvement.*

**RECOMMENDATION:** *The Department should, on a regular basis, perform and document a comprehensive periodic review of FSFN access privileges that includes verification of access by appropriate supervisory personnel independent of the users for whom the access verification pertains.*

**Status (per Offices of Information Technology Services/Child Welfare staff):** *In Progress*

In conjunction with the Office of Child Welfare, Family and Community Services – Information Technology (FCS-IT) is facilitating an access control workgroup to consider the adequacy, understanding, and uniformity of the access control policy and procedures regarding FSFN. The workgroup will consider whether a FSFN-specific policy is recommended to define the Department's approach to managing access controls for current, new, and transitioning users. The workgroup will make recommendations on the scope and frequency of a regular audit process to ensure consistent and appropriate within the established policy. Finally, the workgroup will consider the most effective mechanisms to maintain an adequate understanding of the FSFN access control policy throughout the diverse FSFN user base.

Also, in conjunction with the Office of Child Welfare, FCS-IT is pursuing a Legislative Budget Request (LBR) for funding, beginning July 1, 2015, to support an assessment of the Department's and Community Based Care organizations' compliance with federal, state, HIPAA, and social security rules for protecting personal information; identifying any needed Department policy changes; and defining the roadmap for bringing the Department and its providers into compliance with these policies and regulations, if applicable. The funding will also support quarterly monitoring of FSFN users to verify correctly assigned security profiles.

The anticipated completion date is December 31, 2015, to include the LBR and legislative process.

**FINDING NO. 4:** *Contrary to State of Florida, General Records Schedule GS1-SL requirements for the retention of access control records, the Department did not retain complete FSFN access control records.*

**RECOMMENDATION:** *The Department should retain complete FSFN access control records as required by the General Records Schedule.*

**Status (per Offices of Information Technology Services/Child Welfare staff):** *In Progress*

The Department will improve its FSFN system user account management procedures by:

- Updating procedures that will outline how forms are to be accurately completed and standardize how forms are maintained.
- Creating a procedure to take a semi-annual random sampling of access authorization forms from each regional office and headquarters to ensure policy guidelines on completion, accuracy maintenance are being followed. A formal report will be developed for management on findings that do not comply with the developed policy and procedures for access authorization forms.

- Creating a secured location within the Department network for all access authorization forms to be stored electronically.

The anticipated completion date is December 31, 2014.

**FINDING NO. 5:** *Contrary to Section 119.071(5)(a)2.a., Florida Statutes, the Department collected certain employee social security numbers (SSNs) for granting access to FSFN without specific authorization in law or without having established the imperative need to use the SSN for the performance of its duties and responsibilities as prescribed by law.*

**RECOMMENDATION:** *In the absence of establishing an imperative need for the use of employee SSNs, the Department should discontinue requiring an SSN to be provided when granting access to FSFN.*

**Status (per Offices of Information Technology Services/Child Welfare staff): In Progress**

In conjunction with the Office of Child Welfare, Family and Community Services – Information Technology (FCS-IT) is facilitating an access control workgroup to consider the adequacy, understanding, and uniformity of the access control policy and procedures regarding FSFN. The workgroup will consider whether a FSFN-specific policy is recommended to define the Department's approach to managing access controls for current, new, and transitioning users. The workgroup will make recommendations on the scope and frequency of a regular audit process to ensure consistent and appropriate within the established policy. Finally, the workgroup will consider the most effective mechanisms to maintain an adequate understanding of the FSFN access control policy throughout the diverse FSFN user base.

The anticipated completion date is December 31, 2014.

**FINDING NO. 6:** *Certain Departmental security controls related to logical access needed improvement.*

**RECOMMENDATION:** *The Department should improve security controls related to logical access to ensure the confidentiality, integrity, and availability of data and IT resources.*

**Status (per Offices of Information Technology Services/Child Welfare staff): In Progress**

Analysis of potential steps and impacts needed to address this finding are in progress. As a result of analysis and planning, legislative funding may be required to fully resolve impacts associated with addressing this finding.

**FINDING NO. 7:** *The Department's program change management controls for FSFN needed improvement.*

**RECOMMENDATION:** *The Department should implement controls to reconcile program change requests entered in the Department's change request management system to the contractor's service requests. Additionally, the Department should improve controls related to the approval of program changes promoted to the production environment.*

**Status (per Offices of Information Technology Services/Child Welfare staff): Complete**

The Department has implemented improvements in Change Management controls to electronically store original approved change authorizations within the Rational ClearQuest change management tool, as well as directly associate resulting code changes with the original change authorization. Validation that enhancement code changes and configuration management entries in ClearQuest are traceable to the original change authorization prior to production deployments has been implemented. The Department is periodically monitoring the improvement in the change management process and will report to Department IT Management on the results of validation of ongoing change management controls prior to approval to deploy quarterly enhancement releases.

**FINDING NO. 8:** *FSFN Adoption Assistance Program expenditure reconciliation and review procedures for Community-Based Care (CBC) agencies' payments were inadequate.*

**RECOMMENDATION:** *The Department should implement reconciliation and review procedures to ensure that payments to the CBC agencies for monthly adoption subsidies and one-time adoption fees are complete, accurate, and valid.*

- **Status (per Office of Child Welfare staff): Complete**



In December 2013, *Florida Safe Families Network (FSFN) Reconciliation Process Reference Guide* was developed to provide Department contract managers for the Community Based Care (CBC) Lead Agencies with step-by-step instructions for reconciling FSFN client payment information by Other Cost Accumulator (OCA) with the CBC Monthly Actual Expenditure Report.

Some of these step-by-step instructions include:

- Querying and exporting detailed payment information by clients from FSFN for the time period which coincided with the CBC Monthly Actual Expenditure Report;
- Calculating the client's age to the service month for which the payment was rendered to ensure federal funding allowability; and
- Identifying federal funding changes of adoption subsidy payments when an adopted child's eligibility status had been updated in FSFN.

In addition, in December 2013, the Department's Lead Agency Fiscal Accountability Unit provided online training to the CBC Lead Agency Contract Managers and CBC Lead Agencies fiscal staff.

An electronic copy of this reference guide can be found within Florida's Center for Child Welfare website at: [FSFN Reports, Information and Resources](#).

In January 2014, it was requested that each CBC Lead Agency Contract Manager complete the process for review of CBC reconciliations as described in the reference guide and to submit the completed reconciliation review documentation each month with the approved CBC Invoice and CBC Monthly Actual Expenditure Report to the Lead Agency Fiscal Accountability Unit for review.

Additionally, a standardized FSFN Monthly Actual Expenditure Report reconciliation template for comparing FSFN detailed payment information with the expenditures reported by the CBC Lead Agency was designed by the Department's Lead Agency Fiscal Accountability Unit. This standardized form will provide a consistent reporting of documenting reconciling items, if any, on a month-by-month basis while also providing a year-to-date reconciliation so that outstanding reconciling items can be easily identified. This reconciliation template was disseminated in June 2014 to all CBC Lead Agencies and instructions were provided that each CBC Lead Agency was to complete this reconciliation template and submit the completed reconciliation along with its monthly Invoice and Monthly Actual Expenditure Report. Online training is scheduled to be completed in September 2014.

An electronic copy of the *Florida Safe Families Network (FSFN) to CBC Monthly Expenditure Report Reconciliation Template* can be found on the Department's Intranet website at: [CBC Fiscal Attachments | Florida Department of Children and Families](#).

***FINDING NO. 9:*** *The Department did not enforce the CBC agencies' adherence to Department procedures and guides. Also, FSFN allowed monthly adoption subsidy payments and one-time adoption payment transactions to be entered and processed for amounts greater than allowed by applicable State law and Department rules. In addition, the CBC agencies' users were allowed to change monthly expenditure amounts circumventing established subsidy agreement processes.*

***RECOMMENDATION:*** *The Department should implement appropriate controls to ensure that payments are within the limits established in Sections 409.166(4)(b) and (7), Florida Statutes, and Department of Children and Families Rule 65C-16.012(2), Florida Administrative Code, and are for authorized monthly expenditure amounts.*

***Status (per Office of Child Welfare staff): In Progress***

The Office of Child Welfare (Adoption Program staff) is developing a draft reference document to guide establishment of adoption subsidy and/or "enhanced" subsidy payment. This draft will be further expanded in collaboration with Lead Agency Fiscal Accountability staff to include the supporting documentation required for subsidy and "enhanced" subsidy payments.

Once the reference document is completed, the Office of Child Welfare will add how the payment is documented in FSFN for CBC adoption and fiscal staff to ensure the information is entered consistently.

Using the finalized reference document, the Adoption Program and Lead Agency Fiscal Accountability staff will develop the monitoring plan and present it to Contract Managers for feedback. The workgroup consists of Adoption Program staff, the Lead Agency Fiscal Accountability unit, and CBC Contract Managers. This monitoring plan will be specific to ensure consistency among Contract Managers.

The deadline for phase 2 of this process is October 31, 2014.

**FINDING NO. 10:** *The Department had not met the Federal Statewide Automated Child Welfare Information System (SACWIS) compliance requirements for FSFN.*

**RECOMMENDATION:** *The Department should continue working with Administration for Children and Families (ACF) to develop and implement an acceptable action plan to ensure that FSFN is SACWIS compliant.*

**Status (per Offices of Information Technology Services/Child Welfare staff): In Progress**

The Department successfully deployed a major system release for FSFN in June 2014 that, in the view of the Department, achieves conformance for 77 of 88 Statewide Automated Child Welfare Information System (SACWIS) requirements, subject to federal review. Further system enhancements are currently in design that the Department believes will achieve conformance with 87 of 88 requirements in FY 2014-15.

This follow-up audit was conducted as required by Florida Statutes 20.055(5)(h) and section 2500.A1 of the International Standards for the Professional of Internal Auditing as published by the Institute of Internal Auditors. Elton Jones compiled this follow-up audit from representations provided by program management. Please address inquiries regarding this report to Jerry Chesnutt, Director of Auditing, at (850) 488-8722.