

RICK SCOTT GOVERNOR

JUSTIN M. SENIOR SECRETARY

July 11, 2017

Mr. Justin M. Senior, Secretary Agency for Health Care Administration 2727 Mahan Drive Tallahassee, FL 32308

Dear Secretary Senior,

Enclosed is a six-month status report on the Auditor General's *Agency for Health Care Administration Fraud and Abuse Case Tracking System*, Report Number 2017-093, issued January 2017. This status report is issued in accordance with the statutory requirement to report on corrective actions resulting from the Auditor General's recommendations six months from the report date.

If you have any questions about this status report, please contact Mary Beth Sheffield at 412-3978.

Sincerely,

Mary Beth Sheffield

Mary Beth Sheffield Interim Inspector General

MBS/szg Enclosure: Six-Month Status Report of AG Report# 2017-093 cc/enc: Joint Legislative Auditing Committee Eric W. Miller, Chief Inspector General, EOG Kelly Bennett, Chief, Medicaid Program Integrity Scott Ward, Chief Information Officer, Information Technology



Finding #1	Recommendation	Previous Management Response(s)	Status of Finding as of July 11, 2017	Management Response as of July 11, 2017 and Agency Contact
Information Security Program Plan. The Agency's Information Technology Security Plan needs improvement to provide for comprehensive and current Agencywide security controls to protect the Agency's IT resources.	We recommend that the Agency improve security controls that protect the Agency's IT resources by ensuring that the Agency's Information Technology Security Plan is kept current and includes an information security risk management process. Additionally, we recommend that the Information Technology Security Plan describe the controls in place or planned to meet the security requirements for the Agencywide information security program.	The AHCA Division of IT will update the Information Technology Security Plan (ITSP). <i>Estimated Corrective Action Date:</i> March 1, 2017	Fully Corrected	The Agency has a new Information Security Program Plan. Karen Calhoun (850) 412-4849

Finding #2	Recommendation	Previous Management Response(s)	Status of Finding as of July 11, 2017	Management Response as of July 11, 2017 and Agency Contact
Security Administration Procedures. The Agency had not developed written security administration procedures for authorizing and assigning user access accounts to FACTS.	We recommend that Agency management develop documented and approved security administration procedures for authorizing and assigning user access accounts to FACTS to ensure that access privileges granted are appropriately controlled according to management's expectations.	The Agency's Bureau of Medicaid Program Integrity (MPI) currently has written procedures in place but will develop written FACTS access management policies for authorizing and assigning user access accounts to FACTS. Estimated Corrective Action Date: July 1, 2017	Partially Corrected	Internal Operating Procedures (IOP) Completed. Access oversight is ongoing. Official Access Form under construction and full reconciliation to be completed by August 31, 2017. System enhancements, numerous audits, and preparation for annual report for executive branch competed with full implementation of this task. Shannon Bagenholm (850) 412-4645 Ken Yon (850) 412-4637

Finding #3	Recommendation	Previous Management Response(s)	Status of Finding as of July 11, 2017	Management Response as of July 11, 2017 and Agency Contact
Access Authorization Documentation. Complete and accurate FACTS access authorization documentation was not maintained thereby limiting management's assurance that FACTS user access privileges were authorized and appropriately assigned.	We recommend that Agency management use access authorization forms to document authorized user access privileges granted to FACTS and the network.	Access to the FACTS system is controlled by general network access. Network access is controlled by network authorization forms. Additionally, roles must be granted within the FACTS application itself. Users who have no roles within the system are met with the following error: The following error(s) occurred while trying to process your request ARERR [623] Authentication failed Error Timestamp (Mid-Tier Server): Dec 16, 2016 11:29:14 AM Return to home page	Access to the FACTS system is ontrolled by general network access. letwork access is controlled by network uthorization forms. Additionally, roles must be granted within the FACTS application itself. Jsers who have no roles within the ystem are met with the following error: The following error(s) occurred while trying to process your request: ARERR [623] Authentication failed	
		 AHCA will explore further access restriction options. <i>Estimated Corrective Action Date:</i> July 1, 2017 See response to Finding #2. MPI will incorporate policies on maintaining user authorization and access to FACTS access management policies. <i>Estimated Corrective Action Date:</i> July 1, 2017 	Partially Corrected	IOP Completed. Access oversight is ongoing. Official Access Form under construction and full reconciliation to be completed by August 31, 2017. System enhancements, numerous audits, and preparation for annual report for executive branch competed with full implementation of this task.

Finding #3	Recommendation	Previous Management Response(s)	Status of Finding as of July 11, 2017	Management Response as of July 11, 2017 and Agency Contact
			x	Shannon Bagenholm (850) 412-4645 Ken Yon (850) 412-4637

Finding #4	Recommendation	Previous Management Response(s)	Status of Finding as of July 11, 2017	Management Response as of July 11, 2017 and Agency Contact
Access Control Alignment. User access roles for FACTS were not adequately correlated to users' assigned job duties.	We recommend that the Agency develop FACTS user roles that reflect the required level of FACTS access privileges based on users' assigned job duties.	See response to Finding #2. MPI will incorporate adequate correlation of user access roles to users' assigned job duties in the FACTS access management policies. Estimated Corrective Action Date: July 1, 2017	Partially Corrected	IOP Completed. Access oversight is ongoing. Official Access Form under construction and full reconciliation to be completed by August 31, 2017. System enhancements, numerous audits, and preparation for annual report for executive branch competed with full implementation of this task. Shannon Bagenholm (850) 412-4645 Ken Yon (850) 412-4637

Finding #5	Recommendation	Previous Management Response(s)	Status of Finding as of July 11, 2017	Management Response as of July 11, 2017 and Agency Contact
Appropriateness of Access Privileges. The access privileges for some FACTS users did not promote an appropriate separation of duties and did not restrict users to only those functions necessary for their assigned job duties.	We recommend that Agency management limit user access privileges to FACTS to promote an appropriate separation of duties and to restrict users to only those user access privileges and functions necessary for the users' assigned job duties.	See response to Finding #2. MPI will define the appropriateness of user access privileges and roles in the FACTS access management policies. Estimated Corrective Action Date: July 1, 2017	Partially Corrected	IOP Completed. Access oversight is ongoing. Official Access Form under construction and full reconciliation to be completed by August 31, 2017. System enhancements, numerous audits, and preparation for annual report for executive branch competed with full implementation of this task. Shannon Bagenholm (850) 412-4645 Ken Yon (850) 412-4637

Finding #6	Recommendation	Previous Management Response(s)	Status of Finding as of July 11, 2017	Management Response as of July 11, 2017 and Agency Contact
Periodic Review of User Access Privileges. The Agency had not established procedures for the periodic review of FACTS user access privileges and did not perform such periodic reviews.	We recommend that Agency management establish and implement procedures for the periodic review of FACTS user access privileges to ensure that FACTS user access privileges are authorized	The updated ITSP will address periodic reviews. <i>Estimated Corrective Action Date:</i> March 1, 2017	Fully Corrected	The Agency has recently updated the authentication policy and included this requirement. Karen Calhoun (850) 412-4849
	and remain appropriate.	See response to Finding #2. MPI is actively performing periodic reviews of FACTS user access privileges. MPI will incorporate the periodic review of FACTS user access privileges in the FACTS access management policies. Estimated Corrective Action Date: July 1, 2017	Partially Corrected	IOP Completed. Access oversight is ongoing. Official Access Form under construction and full reconciliation to be completed by August 31, 2017. System enhancements, numerous audits, and preparation for annual report for executive branch competed with full implementation of this task.
				Shannon Bagenholm (850) 412-4645 Ken Yon (850) 412-4637

Finding #7	Recommendation	Previous Management Response(s)	Status of Finding as of July 11, 2017	Management Response as of July 11, 2017 and Agency Contact
Timely Deactivation of Access Privileges. The Agency did not timely deactivate the access privileges of FACTS user accounts for users who separated from Agency employment or transferred into positions that did not require access to FACTS.	We recommend that Agency management ensure that FACTS user account access privileges of former users are timely deactivated to prevent former users or others from misusing the access privileges.	See response to Finding #2. MPI will address the timely deactivation of user access privileges in the FACTS access management policies. Estimated Corrective Action Date: July 1, 2017	Partially Corrected	IOP Completed. Access oversight is ongoing. Official Access Form and full reconciliation to be completed by August 31, 2017. System enhancements, numerous audits, and preparation for annual report for executive branch competed with full implementation of this task. Shannon Bagenholm (850) 412-4645 Ken Yon (850) 412-4637

Finding #8	Recommendation	Previous Management Response(s)	Status of Finding as of July 11, 2017	Management Response as of July 11, 2017 and Agency Contact
Configuration Management Controls. Agency configuration management controls for FACTS need	We recommend that Agency management ensure that controls are in place to provide	The Division of IT will revise its Change Control Process policy and procedures to address Software-as-a-Service (SaaS) solution needs.	Not Corrected	The Division of IT is evaluating how to address this recommendation. Estimated Completion date: 12/31/17
improvement to ensure that controls are in place to provide reasonable assurance that all configuration changes	reasonable assurance that all configuration changes that are moved into the production environment follow an established	<i>Estimated Corrective Action Date:</i> July 1, 2017		Karen Calhoun (850) 412-4849
moved into the production environment follow an established configuration management process and are properly authorized, tested, and approved.	configuration management process and are properly authorized, tested, and approved.	MPI will refer to the response provided by IT.		MPI Response: IT to respond. Shannon Bagenholm (850) 412-4645 Ken Yon (850) 412-4637

Finding #9	Recommendation	Previous Management Response(s)	Status of Finding as of July 11, 2017	Management Response as of July 11, 2017 and Agency Contact
Security Controls – User Authentication, Logging, and Access Controls. Certain security controls related to user authentication, logging, and access controls for FACTS and related IT resources need improvement to ensure the confidentiality, integrity, and availability of FACTS data and related IT resources.	We recommend that Agency management improve certain security controls related to user authentication, logging, and access controls to ensure the confidentiality, integrity, and availability of FACTS data and related IT resources.	The Agency will improve certain security controls as identified in the recommendation. Estimated Corrective Action Date: July 1, 2017 MPI will refer to the response provided by IT.	Partially Corrected	The Agency has remediated some of the recommendations and work is in progress for the remainder. Date of completion is contingent on a security-related procurement. Karen Calhoun (850) 412-4849 MPI Response: IT to respond. Shannon Bagenholm (850) 412-4645 Ken Yon (850) 412-4637