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



Celeste Philip, MD, MPH

Surgeon General and Secretary

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

June 1, 2017

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 16, 2016 when the Office of the Auditor General published its Report Number 2017-075, *Prescription Drug Monitoring Program*. Management's assessment of the current status of corrective actions is included in the enclosed document.

At six months after publication, management reports two corrective actions remain open and are scheduled to be completed no later than March 1, 2018.

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

Sincerely,

James D. Boyd, CPA, MBA

Inspector General

JDB/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 Mark H. Boehmer, Director of Auditing



#### Status of Corrective Action Plans



Report Number: 2017-075

Report Title: Prescription Drug Monitoring Program

Report Date: December 16, 2016

Status As Of June 1, 2017

# No. Finding

The Department of Health
(Department) did not make or
obtain an independent and
periodic assessment of the
effectiveness of relevant service
organization controls for the
Electronic-Florida Online
Reporting of Controlled Substance
Evaluation Program (E-FORCSE®)
system.

#### Recommendation

Because of the critical and sensitive and confidential nature of E-FORCSE® system data, we recommend that Department management make or obtain an independent and periodic assessment of the service organization's relevant internal controls. Such an assessment should include examination of documentation evidencing that service organization employees met contractual requirements related to background screenings and work experience.

#### **Corrective Action Plan**

The Department will amend the contract with its service organization to require current and any future service organizations to provide the results of an annual independent assessment of the service organization's relevant internal controls. The contract will also be amended to include statement of work deliverables that require service organizations to quarterly provide documentation evidencing that the service organization's employees meet contractual requirements related to background screenings and work experience.

### **Status of Corrective Action Plan**

# In Progress.

The Department has amended its Statement of Work (SOW) with the E-FORCSE vendor, to require an independent assessment of the organization's internal controls by September 30, 2017, and will be completed annually thereafter. The SOW was also amended to require the service organization provide documentation evidencing that employees meet relevant background requirements quarterly.

Projected Completion Date – September 30, 2017

2. Enhancements to available E-FORCSE® system data and Department procedures were needed to effectively assess whether pharmacies and dispensing practitioners reported controlled substance dispensing information to the E-FORCSE® system within the timeframe prescribed by State law.

We recommend that Department management work with the E-FORCSE® system contractor to establish a method to effectively and accurately assess whether pharmacies and dispensing practitioners report to the E-FORCSE® system in accordance with the timeframe prescribed by State law each time a controlled substance is dispensed to an individual.

The Department will modify its statement of work to require the service organization to implement an enhancement to the E-FORCSE® system, which will allow staff to effectively and accurately assess whether dispensers are reporting to the E-FORCSE® database in accordance with the timeframe prescribed by State law.

### Not Yet Initiated.

The Department has added the requirement for additional auditing controls to its upcoming requests for proposals. The current contract ends on February 28, 2018. This enhancement will be performed under the next contract period.

Projected Completion Date – March 1, 2018