

Celeste Philip, MD, MPH Surgeon General and Secretary

Vision: To be the Healthiest State in the Nation

May 23, 2018

Celeste Philip, MD, MPH Surgeon General and Secretary Florida Department of Health 4052 Bald Cypress Way, Bin #A00 Tallahassee, Florida 32399-1701

Dear Dr. Philip:

In accordance with State law¹ and the *International Standards for the Professional Practice of Internal Auditing*, I respectfully submit for your approval our office's *Three Year Audit Plan Beginning with Fiscal Year 2018-2019 (Audit Plan)* for the Department of Health (Department).

The Audit Plan is based on the results of our risk assessment and discussions with Department management. The process identified areas of elevated risk or importance to management. It was narrowed to a manageable list of projects covering a variety of Department operations and information technology solutions, with consideration of available resources.

The results presented in the enclosed *Audit Plan* represent our proposal of projects for fiscal year 2018-2019, with some suggested projects that may be addressed in fiscal years 2019-2020 and 2020-2021. We will continue to assess risk among the Department's operations throughout the year which may require revisions to the *Audit Plan*.

Please be reminded State law¹ affords you the ability at any time throughout the year to request our office to perform an audit or review of any program or function that is not included in the *Audit Plan*.

If you have any questions or comments, please let me know.

Sincerely,

Michael J. Bennett, CIA, CGAP, CIG Inspector General

Approved:

Celeste Philip, MD, MPH Surgeon General and Secretary

MJB/mhb Enclosure

¹ Section 20.055(6), Florida Statutes



Accredited Health Department Public Health Accreditation Board



Carryover – Complete Unfinished Fiscal Year 2017-2018 Projects:

Bureau of Environmental Health's Environmental Health Database (Review)

Objective: Review and evaluate system of controls related to fees within the *Environmental Health Database* (EHD) to determine whether controls ensure accurate fee input and prevent inappropriate modification.

Environmental Health Fees in the Health Management System (Audit)

Objectives: Some environmental health (EH) fees were identified in the Department of Health's (Department, DOH) *Health Management System* (HMS), including one-time encounters. We wanted to determine whether such fees were:

- Accurately collected and recorded in HMS by county health department (CHD) staff;
- Reconciled, deposited, and recorded in the Florida Accounting Information Resource; and
- Reflected in EHD.

Also, determine the reason CHDs continue to use HMS for EH transactions.

County Health Departments' Ordering and Shipping Patients' Lab Work (Audit)

Objective: Determine if CHDs use available systems to prepare barcodes for patients' specimens while ordering and shipping lab work.

CHD Dental Clinics' Billing for Dental Services (Audit)

Objective: Determine using data analysis whether CHDs that provide dental services bill Medicaid managed care organizations appropriately.

Verification of Completion of Employee Training Requirements (Audit)

Objectives: Determine whether:

- The Department is compliant with the training component of the Office of the Governor *Executive Order Number 17-319*.
- The Department monitors to ensure the completion of required trainings for newly hired staff, newly hired or newly promoted supervisors, and annual training of all Department employees.

Review of General Controls at CHDs - 2018 (Review)

Objective: Determine whether CHD management has implemented general operating controls over such areas as cash handling, pharmaceuticals, client incentives, environmental health, vehicles, secured areas and server rooms, disaster recovery and business continuity, protection of protected health information (PHI) and personally identifiable information (PII), patient privacy rights, biomedical waste, grants management, SunPass transponders, records management, information technology resource management, dental clinic controls, incident reports, and building safety.

Audit Plan July 1, 2018 – June 30, 2019

New Projects for Fiscal Year 2018-2019:

Newborn Screening Program Certification – June 30, 2018 (Statutorily Required Certification)

Objective: The Office of Inspector General is required by State law² to annually calculate the annual direct costs of the uniform testing and reporting procedures of the Newborn Screening Program, including applicable administrative costs, and certify that such costs are related.

Review of General Controls at CHDs – 2019 (Review)

Objective: Determine whether CHD management has implemented general operating controls over such areas as cash handling, pharmaceuticals, client incentives, environmental health, vehicles, secured areas and server rooms, disaster recovery and business continuity, protection of protected health information (PHI) and personally identifiable information (PII), patient privacy rights, record management, management of information technology resources, dental clinic controls, and building safety.

Bureau of Child Care Food Programs (Audit)

Proposed Objective: Examine processes including contracting, subcontracting, and disbursement to contractors, to determine compliance with law, rule, and Department policy and procedures.

CHDs' Environmental Health Inspections (Audit)

Proposed Objectives: Gain an understanding of issues encountered by CHD EH offices and onsite sewage treatment and disposal system (OSTDS) inspectors. Determine whether data related to OSTDS in EHD is accurately supported by documentation at the CHD level.

Background Checks (Audit)

Proposed Objective: Examine data, including background checks, of the Department's full-time equivalent (FTEs) and other personal services (OPS) employees, contracted staff, and volunteers with previous histories, and their assigned positions that may conflict with such a history (e.g., handling cash and confidential information).

Regionalization of Personnel & Human Resources and Follow Up (Audit)

Proposed Objectives: Objectives may include, but not limited to:

- Timely screening and rescreening of Department employees.
- All positions have a written, approved Position Description, and Ethics Pledge Form.
- Follow up to R-1516DOH-017 Review of the Contractor Background Screening and Employment Verification Process.

The Department's Subcontracts and Related Processes (Audit)

Proposed Objective: Examine the Department's requirements, processes, and approvals process for providers' contracts and other agreements with subcontractors.

The Department's Awarding and Monitoring of Grants to Local Agencies (Audit)

Proposed Objectives: Examine how grants that include federal funds are awarded to local agencies and the subsequent monitoring of the grantees. Determine that such grants are compliant with selected criteria in the Federal Funding Accountability and Transparency Act and 2CFR200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*.

Readiness, Security, and Inventory Controls of the Department's Mobile Medical Treatment Centers and Other Emergency Response Equipment Sites (Review)³

Proposed Objective: Review controls for the immediate activation and deployment of Department staff and equipment. Verify security and inventory controls for the preparedness of the Department's mobile platforms.

User Access to Systems with Confidential Information (Review)

Proposed Objective: Identify the Department's key systems that collect clients' PII and PHI. Select a sample of users in each system. Identify their user role in the system. Compare to their job, job description, documented need.

² Section 383.14(3)(g), Florida Statutes

³ Initiated prior to July 1, 2018.

Audit Plan July 1, 2018 – June 30, 2019

Office of the Children's Medical Services Managed Care Plan/Specialty Programs' Medical Foster Care Program (Review)

Proposed Objective: The objective includes providing management with an independent assessment of compliance risk and controls related to significant complaint requirements, which could lead to significant financial consequences.

Disease Intervention Specialists' Performance Measures (Review)⁴

Proposed Objectives: Review the Department's Disease Intervention Specialists' performance measures.

Internal Audit – Quality Assurance Review (Quality Assurance)⁴

Objective: Evaluate the Department's Internal Audit Unit's conformance with *International Standards for the Professional Practice of Internal Auditing*, the Code of Ethics, the internal audit charter, the organization's risk and control assessment, and the use of successful practices.

⁴ Initiated prior to July 1, 2018.

Long-term Audit Plan

(These projects will be reassessed prior to each fiscal year during the annual DOH IG risk assessment.)

Fiscal Year 2019-2020

Carryover - Complete Unfinished Fiscal Year 2018-2019 Projects

Newborn Screening Program Certification – June 30, 2019 (Annual Certification required by State law)

Review of General Controls at County Health Departments (2020)

Objective: Determine whether CHD management has implemented general operating controls over such areas as cash handling, pharmaceuticals, client incentives, environmental health, vehicles, secured areas and server rooms, disaster recovery and business continuity, protection of protected health information (PHI) and personally identifiable information (PII), patient privacy rights, record management, management of information technology resources, dental clinic controls, and building safety.

Inspections of the Department's Facilities for Americans with Disabilities Act Accommodations Compliance

Objective may include determining whether the Department's facilities are timely and appropriately inspected for compliance with the Americans with Disabilities Act.

The Department of Health's Ethics Culture

Objective: The *International Standards for the Professional Practice of Internal Auditing*, Standard 2110-Governance, requires that the internal audit activity evaluate the design, implementation, and effectiveness of an organization's ethics-related objectives, programs, and activities.

Timeliness of Contract Execution Process

Objective: Analyze the length of time required to execute a contract once a provider is selected. Determine whether the length of time differs from program to program. Identify any "bottlenecks".

Strategic National Stockpile

Objective: The Department is the primary organization responsible for the receipt and distribution of Strategic National Stockpile (SNS). Review controls over the SNS, including to determine whether inventory that expires is rotated timely and is safe for immediate use.

Division of Children's Medical Services Child Protection Team Program

Objectives may include a review of the Child Protection Team Program's contracts. Examine access rights to the *Child Protection Team Information System*, as there are many users throughout the State, including employees of the Department of Health, Department of Children and Families, and contracted providers.

Bureau of Communicable Diseases' Patient Reporting Investigating Surveillance Manager System (PRISM) Objectives may include:

- Identify all manual data input fields and determine whether manual data input controls are effective in helping ensure data accuracy and integrity.
- Identify all data upload sources and determine whether data upload controls are effective in helping ensure data accuracy and integrity.
- Determine whether the laboratory interface controls are effective in helping ensure data accuracy and integrity.

Division of Disability Determinations' Case Load

Objective may include a review of the Division's processes for assigning case load for staff evaluating applicants' eligibility, and staff who perform investigations.

Long-term Audit Plan

(These projects will be reassessed prior to each fiscal year during the annual DOH IG risk assessment.)

Fiscal Year 2020-2021

Carryover - Complete Unfinished Fiscal Year 2019-2020 Projects

Newborn Screening Program Certification – June 30, 2020 (Annual Certification required by State law)

Review of General Controls at County Health Departments (2021)

Objective: Determine whether CHD management has implemented general operating controls over such areas as cash handling, pharmaceuticals, client incentives, environmental health, vehicles, secured areas and server rooms, disaster recovery and business continuity, protection of protected health information (PHI) and personally identifiable information (PII), patient privacy rights, record management, management of information technology resources, dental clinic controls, and building safety.

The Division of Children's Medical Services' Newborn Screening Business Continuity & Disaster Recovery Objectives may include:

- Contracts and agreements with system vendors adequately protect the assets of the Department.
- Business continuity and disaster recovery is adequately planned, documented, tested, and provides adequate assurance of continued business during an incident.

Bureau of Emergency Medical Services' Inspections

Objective: The Bureau's controls over the inspection process of emergency medical services agencies throughout the State.

Division of Medical Quality Assurance's Centralized Complaint Portal

Objectives may include:

- Security and confidentiality of application information is appropriate.
- Integrity of the data processed ensures accurate and complete management reporting.
- Availability of information for business users is consistent with Service Level Agreement requirements.
- Effective and efficient processing of application systems.

Audit Plan Internal Audit Resource Management July 1, 2018 - June 30, 2019

	Mark H. Boehmer, CPA Director of Auditing		Billy Bull Senior Management Analyst II		Ashlea Mincy, CIGA Senior Management Analyst II		Danielle Myrick Senior Management Analyst II		TOTAL HOURS	
Indirect Hours:	<u>Hours</u>	<u>%</u>	<u>Hours</u>	<u>%</u>	Hours	<u>%</u>	Hours	<u>%</u>	<u>Hours</u>	<u>%</u>
Holidays (including Personal Holiday)	80	4%	80	4%	80	4%	80	4%	320	4%
Annual / Sick Leave	200	10%	200	4 % 10%	200	10%	200	10%	800	10%
Training	50	2%	50	2%	50	2%	50	2%	200	2%
Administrative/Other Internal Audit Functions ⁵	820	39%	250	12%	250	12%	250	12%	1,570	19%
External Auditor Coordination	40	2%	200		130	6%	50	2%	220	3%
Travel	40	2%	20	1%	20	1%	20	1%	100	1%
Total Indirect Hours	1,230	59%	600	29%	730	35%	650	31%	3,210	39%
Audits/Reviews/Consulting Projects:										
Completion of Projects Initiated in FY 2017-2018:										
Bureau of Environmental Health's EHD					10	0%			10	0%
Review of General Controls at CHDs - 2018	20	1%							20	0%
Environmental Health Fees in HMS					10	0%			10	0%
CHDs' Ordering and Shipping Patients' Lab Work					20	1%			20	0%
CHD Dental Clinics' Billing for Dental Services	10	0%	70	00/			150	7%	160	2%
Completion of Employee Training Requirements	10	00/	70	3%			10	001	70	1%
Newborn Screening Program Certification - June 30, 2018	40	2%	00	00/	00	00/	10	0%	50	1%
General Controls at CHDs - 2019	95	5%	60	3%	60	3%	60	3%	275	3%
Bureau of Child Care Food Programs	50	2%	360	17%				0%	410	5%
CHDs' Environmental Health Inspections	75	4%	250	12%			20	1%	345	4%
Background Checks	20	1%			250				270	3%
Regionalization of Personnel & Human Resources	20	1%					300	14%	320	4%
Subcontracts and Related Processes	40	2%					350	17%	390	5%
Awarding and Monitoring of Grants to Local Agencies	20	1%			250				270	3%
Mobile Medical Treatment Centers	140	7%	50	2%					190	2%
User Access to Systems with Confidential Information	20	1%					300	14%	320	4%
Medical Foster Care Program	20	1%	250	12%					270	3%
Disease Intervention Specialists' Performance Measures	20	1%			250	12%			270	3%
Internal Audit - Quality Assurance Review	10	0%	200	10%					210	3%
Subtotal	600	29%	1,240	60%	850	17%	1,190	57%	3,880	47%
Other Direct Hours:										
Follow-up of Corrective Action Plans	50	2%	150	7%	200	10%	150	7%	550	7%
Possible Enterprise Project Involvement	50	2%			120	6%		0%	170	2%
Other Projects ⁶	150	7%	90		180	9%	90	4%	510	6%
Subtotal	250	12%	240	7%	500	24%	240	12%	1,230	15%
Total Direct Hours	850	41%	1,480	67%	1,350	41%	1,430	69%	5,110	61%
TOTAL AVAILABLE HOURS	2,080	100%	2,080	96%	2,080	76%	2,080	100%	8,320	100%

⁵ Includes supervisory and administrative duties, QAR coordination, preparing/giving presentations, IIAMS development, meetings, Risk Assessment, Audit Plan, Annual Report, special projects, and other office duties.

⁶ Includes unanticipated projects.