



OFFICE OF THE STATE AUDITOR



November 16, 2018

DIANNE E. RAY, CPA
—
STATE AUDITOR

DEPARTMENT OF HUMAN SERVICES, OFFICE OF BEHAVIORAL HEALTH, MANAGEMENT OF SUBSTANCE ABUSE TREATMENT DATA PERFORMANCE AUDIT (FEBRUARY 2018) STATUS REPORT

Members of the Legislative Audit Committee:

Attached is the status report from the Department of Human Services (Department), Office of Behavioral Health (OBH) on the implementation of recommendations from the Office of the State Auditor's *Management of Substance Abuse Treatment Data* performance audit.

We reviewed supporting documentation from the Department and OBH for each recommendation that they reported as having implemented, as follows:

- Updated policies and procedures, and applicable forms, related to data system user access, security scans, and work orders submitted to OIT.
- Communications and training documentation related to the updated policies and procedures.

Based on our review, the supporting documentation substantiates the reported implementation status.

OFFICE OF THE STATE AUDITOR
1525 SHERMAN STREET
7TH FLOOR
DENVER, COLORADO
80203

303.869.2800



COLORADO
Department of Human Services

October 4, 2018

Dianne E. Ray, CPA
State Auditor
Colorado Office of the State Auditor
1525 Sherman Street, 7th Floor
Denver, CO 80203

Dear Auditor Ray:

In response to your request dated August 29, 2018, the Colorado Department of Human Services has prepared the attached status report on the implementation status of audit recommendations contained in the *Office of Behavioral Health, Management of Substance Abuse Treatment Data Performance Audit* (February 2018). The status report provides a brief description of the actions taken by the Department and the Office of Behavioral Health to implement the recommendations.

If you have any questions about this status report and our efforts to implement the audit recommendations, please contact Robert Werthwein at (303) 866-7655 or robert.werthwein@state.co.us.

Sincerely,

Reggie Bicha
Executive Director
Colorado Department of Human Services

cc: Tony Gherardini, Deputy Executive Director of Operations
Jerene Petersen, Deputy Executive Director of Community Partnerships
Robert Werthwein, Director, Office of Behavioral Health
Michael Tessean, Deputy Director, Office of Behavioral Health
Camille Harding, Director, Community Behavioral Health
Melissa Wavelet, Director, Office of Performance and Strategic Outcomes
Mette Boes, Audit Division Director
Phil Robinson, Legislative Liaison



AUDIT RECOMMENDATION STATUS REPORT

AUDIT NAME	Management of Substance Abuse Treatment Data, Performance Audit, February 2018
AUDIT NUMBER	1751P
AGENCY	Department of Human Services, Office of Behavioral Health (OBH)
DATE OF STATUS REPORT	October 30, 2018

REC. NUMBER	AGENCY'S RESPONSE	ORIGINAL IMPLEMENTATION DATE	CURRENT IMPLEMENTATION STATUS
1A	Agree	July 2018	Implemented
1B	Agree	July 2018	Implemented
1C	Agree	October 2018	Implemented
2A	Agree	July 2018	Implemented
2B	Agree	October 2018	Implemented
2C	Agree	October 2018	Implemented

SECTION II: NARRATIVE DETAIL

RECOMMENDATION 1A			
<p><i>The Department of Human Services should ensure that the Office of Behavioral Health (OBH) improves controls over system user access and protection of substance abuse treatment data by: Establishing and implementing written policies and procedures for identifying the staff and providers who no longer need user access, such as biannually or annually, and removing access in a timely manner.</i></p>			
CURRENT IMPLEMENTATION STATUS	Implemented	CURRENT IMPLEMENTATION DATE	N/A
AGENCY UPDATE			
<p>The Office of Behavioral Health (OBH) created and began following a process for identifying staff and providers who no longer need user access and a process for removing their access in a timely manner starting in July 2018. These processes became OBH policy and procedure #18-08 Data System Access Validation & Revocation in September 2018 when it was approved by the Director of OBH. This policy and procedure ensures that only active and authorized users have access to the OBH substance abuse treatment data system. All users are now required to complete a Statement of Compliance & System Access and Acceptable Use Policy Form (Form) annually. The Form was issued to all users in July 2018, received by the OBH Data & Evaluation Team, manually logged, and all users that did not return a signed Form had their system access revoked starting in October 2018.</p>			

RECOMMENDATION 1B

The Department of Human Services should ensure that the Office of Behavioral Health (OBH) improves controls over system user access and protection of substance abuse treatment data by: Working with the Governor’s Office of Information Technology (OIT) to create written policies for data use and system access that are reviewed and updated annually. The policies should require (1) staff and providers with system access to annually complete a written acknowledgement agreement signifying they have read, understand, and agree to follow applicable information security and data confidentiality requirements; (2) new staff and providers to sign the acknowledgement form before receiving access to the system; and (3) the Department to maintain all forms.

CURRENT IMPLEMENTATION STATUS	Implemented	CURRENT IMPLEMENTATION DATE	N/A
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AGENCY UPDATE

In collaboration with the Governor’s Office of Information Technology, OBH created and began following a process for identifying staff and providers who need user access and a process for removing access in a timely manner starting in July 2018. These processes became OBH policy and procedure #18-09 Data System Access Annual Update in September 2018 when it was approved by the Director of OBH. This policy and procedure created the Statement of Compliance & System Access and Acceptable Use Policy Form (Form). The Form includes current information security requirements and user responsibilities for protecting data. It requires internal staff and providers to annually acknowledge the terms and conditions related to system access. Access is not granted to any users, new or current, without a signed Form. The OBH Data & Evaluation Team will review the Form on an annual basis and update it, as needed, and will scan and maintain all submitted signed Forms electronically on a secure server.

RECOMMENDATION 1C

The Department of Human Services should ensure that the Office of Behavioral Health (OBH) improves controls over system user access and protection of substance abuse treatment data by: Developing an acknowledgement agreement for system and data users which contains current and accurate information security requirements, user responsibilities for protecting data, and a process for updating the form periodically. In addition, OBH should consider utilizing one standard agreement that includes all applicable requirements and user responsibilities, and is signed by all providers and OBH staff.

CURRENT IMPLEMENTATION STATUS	Implemented	CURRENT IMPLEMENTATION DATE	N/A
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AGENCY UPDATE

The new Statement of Compliance & System Access and Acceptable Use Policy Form (Form) was created and implemented in July 2018. The OBH Data & Evaluation Team created one standard acknowledgement agreement form that includes all requirements and user responsibilities for security and user responsibilities for protecting data. The Form will be reviewed on an annual basis and updated, as needed, to ensure compliance with current OIT security requirements and will be used to grant access to new users and to annually renew access for current users. The OBH Data & Evaluation Team will track, scan, and maintain all submitted signed Forms electronically on a secure server.

RECOMMENDATION 2A			
<p><i>The Department of Human Services should ensure that the Office of Behavioral Health's (OBH's) substance abuse treatment data are secure by: Working with the Governor's Office of Information Security (OIT) to implement procedures and clarify staff roles for ensuring annual system security assessments occur, as required by Colorado Information Security Policy (Security Policy), and for ensuring that the results of the assessments are provided to the appropriate Department staff so that any security vulnerabilities can be remediated.</i></p>			
CURRENT IMPLEMENTATION STATUS	Implemented	CURRENT IMPLEMENTATION DATE	N/A
AGENCY UPDATE			
<p>OBH created and began following a process for standardizing regular requests and reviewing monthly system security assessments starting in July 2018. This process became OBH policy and procedure #18-11 Data System Server Scans in September 2018 when it was approved by the Director of OBH. The OBH Data & Evaluation Team began submitting work orders to OIT to perform the monthly system security assessments in November 2017 while the OSA audit was being finalized. This policy and procedure clarifies that the OBH Data & Evaluation Team has designated a subject matter expert who is responsible for working with OIT to request and track monthly security assessments of all OBH data system servers, and to follow up on OIT remediation plans, as needed. The OBH Data & Evaluation Team retains documentation of all work orders, reports, and OIT remediation plans.</p>			

RECOMMENDATION 2B			
<p><i>The Department of Human Services should ensure that the Office of Behavioral Health's (OBH's) substance abuse treatment data are secure by: Implementing written policies and procedures that specify the Department's responsibilities for ensuring compliance with Security Policy and that require OBH staff to (1) document work orders submitted to OIT or the third party vendor, and (2) follow up to ensure work orders are completed as requested.</i></p>			
CURRENT IMPLEMENTATION STATUS	Implemented	CURRENT IMPLEMENTATION DATE	N/A
AGENCY UPDATE			
<p>OBH created and began following a process for ensuring compliance with the OIT Colorado Information Security Policies (CISP) and following up to ensure that work orders are documented and completed in July 2018. This process became OBH policy and procedure #18-12 Data System Documenting and Tracking Tickets and Change Orders in September 2018 when it was approved by the Director of OBH. This policy and procedure requires that the OBH Data & Evaluation Team have meetings with OIT to discuss open tickets, change orders, ensure work orders are completed by OIT as requested by OBH, and to discuss upcoming projects. Currently, OBH and OIT staff have standing weekly meetings and, at a minimum, meet on a monthly basis. A shared document on the Google drive is updated by both groups to track changes and progress throughout the month. When working with third party vendors, they are expected, by contract, to follow all OIT CISPs and OBH policies and procedures.</p>			

RECOMMENDATION 2C			
<i>The Department of Human Services should ensure that the Office of Behavioral Health's (OBH's) substance abuse treatment data are secure by: Training OBH staff on the new policies and procedures recommended in Parts A and B.</i>			
CURRENT IMPLEMENTATION STATUS	Implemented	CURRENT IMPLEMENTATION DATE	N/A
AGENCY UPDATE			
<p>OBH created and began following a process for training OBH staff on the new policies and procedures related to substance abuse treatment data in July 2018. This process became OBH policy and procedure #18-13 Data System Security Training in September 2018 when it was approved by the Director of OBH. The subject matter expert trained the OBH Data & Evaluation Team on the new policies and procedures #18-11 and #18-12 during their daily standup meetings. The new policies #18-08, #18-09, and #18-10 were communicated to all OBH staff at both the July 2018 and October 2018 All-Staff Meetings. The staff were trained as internal users on the new policies and procedures and the new processes to maintain current data system access. As new staff are brought on board that require data system access, these staff members will be individually trained on the security measures and agreements required to maintain the confidentiality of clients in all OBH data systems.</p>			