

# REPORT HIGHLIGHTS



MANAGEMENT OF SUBSTANCE ABUSE TREATMENT DATA  
PERFORMANCE AUDIT, FEBRUARY 2018

DEPARTMENT OF HUMAN SERVICES  
OFFICE OF BEHAVIORAL HEALTH

## CONCERN

The Office of Behavioral Health (OBH) should improve its processes for ensuring the security of the Treatment Management System (TMS), which holds data on individuals who receive substance abuse treatment, and improve its coordination with the Governor's Office of Information Technology (OIT), which develops information security policy and completes OBH's system security work requests.

## KEY FINDINGS

- OBH's collection of substance abuse treatment recipient data aligns with federal and state statutes and regulations and supports OBH's role as the administrator of the federal block grant and as the State's licensing authority for substance abuse providers. OBH's processes to protect treatment recipient data include tracking recipients using unique identifiers rather than personally identifiable information, encrypting data that providers transmit to OBH, and limiting user access to TMS.
- In 2017, OBH did not terminate TMS access for three of its staff when their jobs changed or for 10 of 20 sampled providers whose licenses had expired. In addition, OBH did not maintain data use agreements for seven of its staff and 15 sampled providers, so there was no evidence that these users had agreed to protect treatment recipient data. Although no instances of improper data access or disclosure were identified, when TMS user access is not terminated in accordance with policies, there is an increased risk that treatment recipient data can be misused.
- OBH did not monitor whether TMS security scans and data destruction (for data aged 10 years) occurred annually, as required by state and OBH policies. This led to a 2-year gap in system security scans from 2015 to 2017, and data destruction occurred only once between Fiscal Years 2012 and 2018. Security scans and data destruction help ensure that systems and data are secure.

## BACKGROUND

- OBH regulates, funds, and monitors substance abuse treatment and providers in Colorado; licenses providers; and administers the State's federal block grant program for substance abuse treatment.
- OBH tracks data on substance abuse treatment and individuals treated by licensed providers. OBH uses these data to meet federal and state reporting requirements, help courts track who completes court-ordered treatment, monitor licensees, assess substance abuse and treatment trends, and plan treatment and prevention programs.
- During Fiscal Year 2017, a total of 697 substance abuse treatment provider locations were licensed in Colorado and they treated approximately 65,000 people.

## KEY RECOMMENDATIONS

- Implement procedures to identify the staff and providers who no longer need system access and remove access in a timely manner, work with OIT to create written policies requiring those with system access to complete data use agreement forms annually, and maintain all forms.
- Work with OIT to implement procedures and clarify staff roles for ensuring security scans occur and the results are provided to the Department, implement policies for ensuring that system-related work requests are completed as requested, and train staff on the new policies and procedures.

The Department agreed with these recommendations.