

**DEPARTMENT OF CHILDREN  
AND FAMILIES**

**FLORIDA SAFE FAMILIES NETWORK (FSFN)**

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**Information Technology Operational Audit**



## SECRETARY OF THE DEPARTMENT OF CHILDREN AND FAMILIES

Pursuant to Section 20.19(2)(a), Florida Statutes, the Secretary of the Department of Children and Families is appointed by the Governor, subject to confirmation by the Senate. During the period of our audit, the following individuals served as Department Secretary or Interim Secretary:

Esther Jacobo, Interim Secretary	From July 2013
David Wilkins, Secretary	February 2011 to July 2013

The audit team leader was Andrew Denny and the audit was supervised by Tina Greene, CPA, CISA. Please address inquiries regarding this report to Arthur Hart, CPA, Audit Manager, by e-mail at [arthart@aud.state.fl.us](mailto:arthart@aud.state.fl.us) or by telephone at (850) 412-2923.

This report and other reports prepared by the Auditor General can be obtained on our Web site at [www.myflorida.com/audgen](http://www.myflorida.com/audgen); by telephone at (850) 412-2722; or by mail at G74 Claude Pepper Building, 111 West Madison Street, Tallahassee, Florida 32399-1450.

**DEPARTMENT OF CHILDREN AND FAMILIES**

## Florida Safe Families Network (FSFN)

**SUMMARY**

The Federal Adoption Assistance Program, administered by the United States Department of Health and Human Services, Administration for Children and Families, provides Federal funds to states to be used for placing special needs children with adoptive families. Florida Safe Families Network (FSFN) is Florida's official Statewide Automated Child Welfare Information System (SACWIS) and must meet Federal requirements for documenting and reporting child welfare for Florida.

FSFN is a Statewide child welfare and client management information system housed and operated at the Northwood Shared Resource Center (NSRC). FSFN is the Department of Children and Families' (Department) official recordkeeping system for documenting child protective investigations and child welfare casework Statewide, from the initial reporting of abuse and neglect to foster care and adoptions case management and permanency planning.

Our audit focused on evaluating selected information technology (IT) controls applicable to the FSFN Adoption Assistance Program. Our audit disclosed areas in which enhancements in FSFN controls and operational processes were needed.

The results of our audit are summarized below:

**Finding No. 1:** The access privileges of some FSFN users were not appropriate for their job responsibilities or were no longer needed.

**Finding No. 2:** Authorization documentation for FSFN access privileges for some users was missing and, in some instances, the access control documentation was incomplete and inaccurate.

**Finding No. 3:** The Department's periodic review of FSFN access privileges needed improvement.

**Finding No. 4:** Contrary to State of Florida, *General Records Schedule GS1-SL* requirements for the retention of access control records, the Department did not retain complete FSFN access control records.

**Finding No. 5:** Contrary to Section 119.071(5)(a)2.a., Florida Statutes, the Department collected certain employee social security numbers (SSNs) for granting access to FSFN without specific authorization in law or without having established the imperative need to use the SSN for the performance of its duties and responsibilities as prescribed by law.

**Finding No. 6:** Certain Departmental security controls related to logical access needed improvement.

**Finding No. 7:** The Department's program change management controls for FSFN needed improvement.

**Finding No. 8:** FSFN Adoption Assistance Program expenditure reconciliation and review procedures for Community-Based Care (CBC) agencies' payments were inadequate.

**Finding No. 9:** The Department did not enforce the CBC agencies' adherence to Department procedures and guides. Also, FSFN allowed monthly adoption subsidy payments and one-time adoption payment transactions to be entered and processed for amounts greater than allowed by applicable State law and Department rules. In addition, the CBC agencies' users were allowed to change monthly expenditure amounts circumventing established subsidy agreement processes.

**Finding No. 10:** The Department had not met the Federal SACWIS compliance requirements for FSFN.

**BACKGROUND**

The Department was created pursuant to Section 20.19, Florida Statutes, which states, in part, that the Department is to work in partnership with local communities to protect the vulnerable, promote strong and

economically self-sufficient families, and advance personal and family recovery and resiliency. Also, Section 409.166(3)(a), Florida Statutes, designates the Department as the State agency responsible for establishing and administering an adoption program for children and that the program shall attempt to increase the number of persons seeking to adopt children and the number of finalized adoptions and shall extend adoption assistance, when needed, to the adoptive parents of a child. As previously stated, FSFN is the Department's official recordkeeping system for documenting child protective investigations and child welfare casework Statewide, including adoption case management. As part of administering the Adoption Assistance Program, the Department contracts with the CBC agencies to provide protective care and child-welfare services for vulnerable children and their families. The CBC agencies may subcontract some services to specialized providers. Both the Department and the CBC agencies use FSFN in administering the Adoption Assistance Program.

FSFN is designed and developed to meet the State of Florida's requirements for a child-welfare system and meet Federal reporting requirements for child protection, foster care, and adoption. FSFN automates casework practice and integrates client, service, financial, and provider data to provide workers, supervisors, and administrators with the information they need to protect children, help families, and manage child-welfare programs.

## FINDINGS AND RECOMMENDATIONS

### Finding No. 1: Appropriateness of Access Privileges

Effective access controls include measures that limit user access privileges to only what is necessary in the performance of assigned job responsibilities and promote an appropriate separation of job duties. Appropriately restricted access privileges help protect data and IT resources from unauthorized disclosure, modification, and destruction.

Our review of 42 user accounts with access as of June 30, 2013, to selected functions within FSFN indicated that 18 user accounts were granted inappropriate access privileges with respect to their job duties and positions within the Department. Additionally, we noted that some security profiles within FSFN, by design, allowed the performance of system functions that were contrary to an appropriate separation of duties, such as the combination of provider maintenance and creation of payments. We also noted that the Department allowed the assignment of multiple security profiles to a user within FSFN which, when combined, allowed the performance of system functions that were incompatible, such as the ability to create financial payments and change providers.

In addition to the 18 user accounts with inappropriate access privileges, 3 user accounts belonged to former employees who retained access privileges after their dates of termination. The access privileges for 1 of the 3 former employees had been deactivated as of the date of our review, but had remained active for a period of 10 days after the termination date. The access privileges of the 2 remaining former employees remained active as of the date of our review, or 241 and 309 days after their termination dates. The FSFN access privileges of the 3 former employees were not used after their dates of termination.

Access to incompatible and inappropriate functions increase the risk that misappropriation of assets and erroneous manipulation of data may occur.

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**Recommendation:** The Department should limit user access to data and IT resources to only access privileges that are necessary to perform job responsibilities and to promote an appropriate separation of duties. Additionally, the Department should ensure that the access privileges of former employees are deactivated in a timely manner.

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**Finding No. 2: Access Authorization and Control Documentation**

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Effective access authorization practices include, among other things, the use of access authorization forms to document the user access privileges that management has authorized. Additionally, access control documentation should be maintained in an adequate manner to facilitate the complete and accurate assignment of access privileges.

We requested access authorization documentation for 35 active FSN user accounts as of June 30, 2013, to determine if access granted to FSN was adequately documented and authorized. For 24 of the 35 user accounts, authorization documentation for the user access privileges did not exist. Our review of the 11 access authorization documents provided to us by the Department disclosed that 4 of the documents did not contain the security profiles that had been assigned to the users.

Also, our audit disclosed instances where access control documentation was not complete and accurate. Specifically, we identified the following:

- The FSN security profile matrix, used to identify all functions authorized for each security profile, did not include all security profiles within FSN.
- The FSN default values for the field job titles document, used to identify the correct security profile to assign based on the employee's job title, did not encompass all available security profiles in FSN or job titles applicable to FSN.

The absence of documentation of management's authorization of user access privileges and incomplete and inaccurate access control documentation may limit the Department's ability to ensure that user access privileges do not exceed what is necessary for the accomplishment of user assigned job responsibilities.

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**Recommendation:** The Department should maintain documentation of management's authorization for user access privileges and also maintain complete and accurate access control documentation.

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**Finding No. 3: Periodic Review of Access Privileges**

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Periodic review of access privileges helps ensure that access privileges remain appropriate. Although the Department implemented some procedures to identify inappropriate access, a comprehensive periodic review process was not in place to include verification of FSN access privileges by appropriate supervisory personnel independent of the users for whom the access verification pertained. As a result, management could not be assured that periodic reviews of FSN access privileges for all personnel were being performed and, in turn, that the access privileges defined for users continued to be appropriate. Without an adequate, periodic review of access privileges, there is an increased risk of inappropriate access to data files and programs that could result in compromised data integrity.

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**Recommendation:** The Department should, on a regular basis, perform and document a comprehensive periodic review of FSN access privileges that includes verification of access by appropriate supervisory personnel independent of the users for whom the access verification pertains.

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**Finding No. 4: Access Control Records Retention**

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The State of Florida, *General Records Schedule GS1-SL for State and Local Government Agencies (General Records Schedule)* provides that access control records must be retained for one anniversary year after superseded or after the employee separates from employment. Contrary to the *General Records Schedule* requirements, the Department did not retain complete FSFN access control records. While the Department has the ability to deactivate FSFN user accounts, the deactivation times were not recorded.

Without adequate retention of complete FSFN access control records, the risk is increased that the Department may not have sufficient documentation to assist in future investigations of security incidents, should they occur. Additionally, the Department is not in compliance with the State's record retention requirements.

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**Recommendation:** The Department should retain complete FSFN access control records as required by the *General Records Schedule*.

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**Finding No. 5: Use of Social Security Numbers (SSNs)**

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Section 119.071(4)(a), Florida Statutes, provides that all employee SSNs held by the employing agency are confidential and exempt from public inspection. Pursuant to Section 119.071(5)(a)2.a., Florida Statutes, an agency may not collect an individual's SSN unless the agency has stated in writing the purpose for its collection and unless the agency is specifically authorized by law to do so or it is imperative for the performance of that agency's duties and responsibilities as prescribed by law.

We noted that, to obtain access to FSFN, employees were required to provide their SSNs on access authorization forms. No specific authorization existed in State law for the Department to collect the SSNs of employees who used FSFN and the Department had not established the imperative need to use the SSNs for the performance of its duties and responsibilities instead of other unique identifiers. The use of the SSNs is contrary to State law and increased the risk of improper disclosure of the SSNs.

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**Recommendation:** In the absence of establishing an imperative need for the use of employee SSNs, the Department should discontinue requiring an SSN to be provided when granting access to FSFN.

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**Finding No. 6: Other Security Controls**

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Security controls are intended to protect the confidentiality, integrity, and availability of data and IT resources. Our audit disclosed certain Department security controls related to logical controls that needed improvement. We are not disclosing specific details of the issues in this report to avoid the possibility of compromising Department data and IT resources. However, we have notified appropriate Department management of the specific issues. Without adequate security controls related to logical access, the risk is increased that the confidentiality, integrity, and availability of data and IT resources may be compromised.

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**Recommendation:** The Department should improve security controls related to logical access to ensure the confidentiality, integrity, and availability of data and IT resources.

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**Finding No. 7: Program Change Management**


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Effective controls over modification of application programs help ensure that only authorized, tested, and approved changes are implemented. Program changes to FSFN are approved and documented using an agreed-upon contract governance plan established with an outside contractor (contractor). The Department's individual program change requests are batched together periodically by the contractor into a service request that is then approved by the Department and the contractor. The program changes approved in the service request are entered individually into the Department's change request management system.

Through our audit, we determined the following:

- The Department had not implemented controls to reconcile the Department's individual program change requests to the service request that was originally approved by the Department and the contractor. As a result, the Department could not readily provide documentation for the authorizations of the program change requests entered in the Department's change request management system.
- Once a program change is complete and ready to be moved into production, the Department's change request management system requires two independent approvals to promote program changes to the FSFN production environment. However, our review disclosed two instances where the same individual approved the program changes that were promoted to the production environment.

Without controls to monitor and approve program changes to FSFN, the risk is increased that unauthorized or erroneous programs may be moved into the production environment without timely detection.

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**Recommendation:** The Department should implement controls to reconcile program change requests entered in the Department's change request management system to the contractor's service requests. Additionally, the Department should improve controls related to the approval of program changes promoted to the production environment.

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**Finding No. 8: Expenditure Reconciliation and Review Procedures**


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The performance of reconciliation and review procedures helps ensure that data entered and processed by an application is complete, accurate, and valid. The CBC agencies are required to submit monthly invoices to the Department, along with copies of the CBC agencies' *Monthly Actual Expenditure Reports* and supporting documentation. As part of this process, adoption data from FSFN relating to the monthly adoption subsidies and one-time adoption fees paid should be reconciled to the related CBC agencies' accounting data and reflected in the CBC agencies' *Monthly Actual Expenditure Reports*. Once the documentation is received by the Department, it is to be reviewed, approved, and processed for payment in the Florida Accounting Information Resource Subsystem (FLAIR).

Our review disclosed that the reconciliation and review procedures being performed by the Department were inadequate to ensure that data from FSFN was reconciled to the related CBC agencies' *Monthly Actual Expenditure Reports* and accounting data. Although Department procedures required the reconciliation of FSFN data to the related CBC agencies' *Monthly Actual Expenditure Reports* and accounting data, when the data did not match, documentation was not available to demonstrate that the reports reconciled. In addition, the Department's review procedures were not being performed in enough detail to ensure that individual payments in FSFN for monthly adoption subsidies and one-time adoption fees were reconciled to the CBC agencies' *Monthly Actual Expenditure Reports* and related accounting data. Invoices from the CBC agencies were processed for payment in FLAIR regardless.

Without an adequate payment reconciliation and review process, there is an increased risk that payments made to the CBC agencies may not be complete, accurate, and valid.

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**Recommendation:** The Department should implement reconciliation and review procedures to ensure that payments to the CBC agencies for monthly adoption subsidies and one-time adoption fees are complete, accurate, and valid.

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**Finding No. 9: FSN Payment Controls**

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Section 409.166(4)(b), Florida Statutes, provides that the Department shall provide adoption assistance to the adoptive parents, subject to specific appropriation, in the amount of \$5,000 annually, paid on a monthly basis, for the support and maintenance of a child until the 18th birthday of such child or in an amount other than \$5,000 annually as determined by the adoptive parents and the Department and memorialized in a written agreement between the adoptive parents and the Department. Section 409.166(7), Florida Statutes, further states that the Department is authorized to reimburse up to \$1,000 in nonrecurring expenses (i.e., one-time expenses, such as attorney's fees, court costs, birth certificate fees, travel expenses, agency fees, and physical examination fees) related to the adoption of a child which have been incurred by adoptive parents. Additionally, Department of Children and Families Rule 65C-16.012(2), Florida Administrative Code, provides that a monthly payment may be made for support and maintenance of a special-needs child until the child's 18th birthday.

The Department had established and made available, on the Department's intranet, numerous procedures and guides to assist CBC agency users in establishing FSN controls. However, the Department did not require that the CBC agencies adhere to the Department's procedures and guides. In addition, through our review of FSN controls related to Adoption Assistance Program monthly and one-time subsidy expenditures (nonrecurring expenses), we determined that adequate controls were not in place to prevent or detect subsidy payments in excess of the allowed limits. For example, FSN data edits did not prevent payments for monthly adoption subsidies after the adopted child's 18th birthday month (age specified in Section 409.166(4)(b), Florida Statutes, and Department of Children and Families Rule 65C-16.012(2), Florida Administrative Code). In addition, the CBC agency users were allowed to change established monthly expenditure amounts, thus circumventing the subsidy agreement processes.

Without adequate controls in place to ensure that payments are within established statutory limits and for authorized monthly expenditure amounts, the risk is increased that inappropriate payments may be processed without detection.

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**Recommendation:** The Department should implement appropriate controls to ensure that payments are within the limits established in Sections 409.166(4)(b) and (7), Florida Statutes, and Department of Children and Families Rule 65C-16.012(2), Florida Administrative Code, and are for authorized monthly expenditure amounts.

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**Finding No. 10: Statewide Automated Child Welfare Information System (SACWIS) Compliance**

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The Administration for Children and Families (ACF), a division of the Federal Department of Health and Human Services, is to promote the economic and social well-being of families, children, individuals, and communities through a range of programs. ACF programs include, among others, the adoption program. ACF, along with other Federal entities, developed numerous policy and technical documents to assist states in planning, developing, and implementing a SACWIS. FSN was developed by the Department using Federal funds as the State's SACWIS and, therefore, must adhere to the Federal SACWIS requirements.

ACF completed the review of FSFN for SACWIS compliance in 88 defined requirements in 2011 and identified findings related to FSFN's conformance with some of the 88 SACWIS requirements. ACF communicated the final results to the Department on December 1, 2011. These results included observations, findings, and technical assistance recommendations developed by the Federal review team. The *SACWIS Assessment Review Report (SARR)* noted 12 findings that were related to nonconforming requirements and 29 findings that were related to conditional conformance for a total of 41 findings.

As a result of the ACF *SARR*, the Department has been working with ACF to develop an action plan to correct the findings. Once ACF accepts the Department's *SARR Response to ACF Findings* as complete, the accepted response becomes the formal action plan for correction as required by ACF.

The Department's *SARR Response to ACF Findings* in January 2013 reported that 12 findings were corrected and the remaining 29 findings will be addressed through the high-level project plan, *Child Protection Transformation Project (Project)*, once the *SARR Response to ACF Findings* is accepted by ACF. The initial timeline for the completion of the *Project* was October 2013 with a Statewide implementation of October 2014; however, the *Project* is behind schedule. The *Project* is divided into four builds. The first build (Quarter 1 build) was deployed on November 10, 2013. The Quarter 2 build was deployed on December 15, 2013. The Quarter 3 build is scheduled for March 30, 2014. The final build (Quarter 4 build) is scheduled for June 29, 2014. Statewide implementation is scheduled for completion between October 2014 and December 2014.

Without a Federally compliant SACWIS system, the risk is increased that FSFN will not operate as intended and not meet Federal and State requirements.

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**Recommendation:** The Department should continue working with ACF to develop and implement an acceptable action plan to ensure that FSFN is SACWIS compliant.

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## OBJECTIVES, SCOPE, AND METHODOLOGY

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The Auditor General conducts operational audits of governmental entities to provide the Legislature, Florida's citizens, public entity management, and other stakeholders unbiased, timely, and relevant information for use in promoting government accountability and stewardship and improving government operations.

We conducted this IT operational audit from September 2013 through January 2014 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The objectives of this IT operational audit were to determine the effectiveness of selected IT controls in achieving management's control objectives in the categories of compliance with controlling laws, administrative rules, and other guidelines; the confidentiality, integrity, availability, relevance, and reliability of data; and the safeguarding of IT resources.

The scope of our audit focused on evaluating selected Department IT controls applicable to FSFN during the period July 1, 2012, through June 30, 2013, and selected actions through January 17, 2014. The audit also included selected general IT controls over systems modification and logical access to programs, data, and data files.

This audit was designed to identify, for the IT system and controls included within the scope of the audit, deficiencies in management's internal controls and IT controls; instances of noncompliance with applicable governing laws, rules, or contracts; and instances of inefficient or ineffective IT operational policies, procedures, or practices. The focus of this IT operational audit was to identify problems so that they may be corrected in such a way as to improve government accountability and efficiency and the stewardship of management. Professional judgment has been used in determining significance and audit risk and in selecting the particular IT controls, legal compliance matters, and records considered.

As described in more detail below, for the IT system and controls included within the scope of the audit, the audit work included, but was not limited to, communicating to management and those charged with governance the scope, objectives, timing, overall methodology, and reporting of our audit; obtaining an understanding of the IT system and controls; exercising professional judgment in considering significance and audit risk in the design and execution of the research, interviews, tests, analyses, and other procedures included in the audit methodology; obtaining reasonable assurance of the overall sufficiency and appropriateness of the evidence gathered in support of our audit's findings and conclusions; and reporting on the results of the audit as required by governing laws and auditing standards.

Our audit included the selection and examination of IT system controls and records. Unless otherwise indicated in this report, these items were not selected with the intent of statistically projecting the results, although we have presented for perspective, where practicable, information concerning relevant population value or size and quantifications relative to the items selected for examination.

An audit by its nature does not include a review of all records and actions of agency management, staff, and vendors and, as a consequence, cannot be relied upon to identify all instances of noncompliance, fraud, abuse, or inefficiency.

In conducting our audit, we:

- Interviewed Department personnel.
- Obtained an understanding of FSFN, including the purpose and goals; computing platform and related software; access controls; and periodic reviews of access, data flow, external interfaces, and change management.
- Observed and evaluated the effectiveness of application access controls in appropriately restricting access to the FSFN Adoption Assistance Program. Specifically, we evaluated 42 user accounts to determine the appropriateness of user access privileges granted and termination procedures to FSFN as of June 30, 2013.
- Observed and evaluated the effectiveness of access controls in appropriately restricting access to FSFN Adoption Assistance Program datasets, including proper separation of duties. Specifically, we evaluated 32 user accounts as of October 30, 2013; 2 user accounts as of November 15, 2013; and 35 user accounts as of January 15, 2014.
- Observed and evaluated the effectiveness of the logging of changes to security profiles to ensure accountability for security changes.
- Observed and evaluated the appropriateness of logical access controls to the FSFN Adoption Assistance Program.
- Observed and evaluated the effectiveness of FSFN Adoption Assistance Program access authorization procedures and periodic reviews. Specifically, we reviewed 35 active FSFN user accounts as of June 30, 2013, to evaluate the access authorization procedures.
- Observed and evaluated FSFN Adoption Assistance Program input, processing, and output control procedures, as well as management override controls, intended to promote the timeliness, accuracy, and completeness of child-welfare data.

- Observed and evaluated the adequacy of controls that ensure FSFN Adoption Assistance Program financial records reconcile to FLAIR and that payments cancelled in FLAIR are recorded in FSFN Adoption Assistance Program financial records.
- Observed and evaluated the effectiveness of the FSFN Adoption Assistance Program to ensure that the application logging adequately documented key elements of transactions related to child-welfare claims.
- Observed and evaluated the effectiveness of change management processes and controls to ensure that FSFN Adoption Assistance Program modifications are suitably authorized, tested, approved, and subsequently moved into production by appropriate individuals. Specifically, we reviewed 26 of 567 modifications that were moved into production between July 1, 2012, and June 30, 2013.
- Observed and evaluated the adequacy of automatic triggers and exception reports and manual follow-up activities, including automatic stop payments and data exception reporting.
- Performed various other auditing procedures as necessary to accomplish the objectives of the audit.

**AUTHORITY**

Pursuant to the provisions of Section 11.45, Florida Statutes, I have directed that this report be prepared to present the results of our IT operational audit.



David W. Martin, CPA  
Auditor General

**MANAGEMENT'S RESPONSE**

In a letter dated March 11, 2014, the Interim Secretary provided responses to our preliminary and tentative findings. This letter is included at the end of this report as EXHIBIT A.

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EXHIBIT A  
MANAGEMENT'S RESPONSE



State of Florida  
Department of Children and Families

Rick Scott  
Governor

Esther Jacobo  
Interim Secretary

March 11, 2014

Mr. David W. Martin  
Auditor General  
G74 Claude Pepper Building  
111 West Madison Street  
Tallahassee, FL 32399-1450

Dear Mr. Martin:

Thank you for your February 13 letter accompanying the preliminary findings and recommendation of your report to be prepared on the Information Technology Operational Audit of the Department of Children and Families, Florida Safe Families Network (FSFN).

The Department generally concurs with the findings of your report. Enclosed is the Department's response to the specific recommendations and the proposed corrective actions.

If your staff has any questions, please have them contact Andrea Tulloch, Esq., Director of the Office of Child Welfare, at (850) 922-2298, or Marc Slager, Director of Florida Safe Families Network, at (850) 320-9299.

If I may be of further assistance, please let me know.

Sincerely,

Esther Jacobo  
Interim Secretary

Enclosure

1317 Winewood Boulevard, Tallahassee, Florida 32399-0700

Mission: Protect the Vulnerable, Promote Strong and Economically Self-Sufficient Families, and Advance Personal and Family Recovery and Resiliency

**EXHIBIT A (CONTINUED)**  
**MANAGEMENT'S RESPONSE**

**RESPONSE TO PRELIMINARY AND TENTATIVE AUDIT FINDINGS**

**FLORIDA DEPARTMENT OF CHILDREN AND FAMILY SERVICES**

***FLORIDA SAFE FAMILIES NETWORK (FSFN)***

***Operational Audit***

**Finding No. 1:** The access privileges of some FSFN users were not appropriate for their job responsibilities or were no longer needed.

**Recommendation:** The Department should limit user access to data and IT resources to only access privileges that are necessary to perform job responsibilities and to promote an appropriate separation of duties. Additionally, the Department should ensure that the access privileges of former employees are deactivated in a timely manner.

**Office of Information Technology Services Response:** In some cases, when an employee changes roles, supervisors may not have removed FSFN privileges necessary for the employee's previous job as required by DCF security procedures. The Department is reviewing what corrective actions are necessary to improve enforcement of security procedures to address this finding and will implement changes in the next fiscal year.

Regarding separation of duties as noted in the finding, the Department will review the FSFN security profiles against job requirements and develop a plan in the next fiscal year to address discrepancies.

When the Department separates or terminates an employee, their LDAP account is immediately deactivated by the Department severing all FSFN access. Prior to inactivating the FSFN account, the Department must reassign all active casework. While access has been removed, the Department will work with Regional Security Officers to minimize the time between separation and inactivation of the FSFN profile.

**Office of Child Welfare Response:** The Department's current security procedures require supervisors of employees to approve the appropriate level of access for security requests based on a staff member's job duties. When a current employee's job duties change due to reassignment or transfer to another region, the previous supervisor must request revocation or suspension of existing employee access privileges, and the new supervisor will approve a security access request form for the new job duties.

As stated above the Department is 1) reviewing what corrective actions are necessary to improve enforcement of security procedures, 2) will review the FSFN security profiles against job requirements and develop a plan to address discrepancies, and 3) will work with Regional Security Officers to minimize the time between separation and inactivation of the FSFN profile,

Anticipated completion date: 12/31/2014.

**Finding No. 2:** Authorization documentation for FSFN access privileges for some users was missing and, in some instances, the access control documentation was incomplete and inaccurate.

**EXHIBIT A (CONTINUED)  
MANAGEMENT'S RESPONSE**

**Recommendation:** The Department should maintain documentation of management's authorization for user access privileges and also maintain complete and accurate access control documentation.

**Office of Information Technology Services Response:** The practice of maintaining local paper copies of security request forms in each region can make them difficult to locate after a period of time elapses or significant staff turnover occurs. The Department will perform analysis in the next fiscal year to determine the cost to establish a centralized repository of security access documentation, with the goal of eliminating the current paper process.

The Department will publish an updated FSFN security profile matrix and revised field job titles document to include all security profiles available within FSFN by June 30, 2014.

**Office of Child Welfare Response:** In accordance with current statewide security policy, the Department has established regional security officers responsible for processing FSFN security requests as approved by supervisors with the correct documentation. Each regional security officer currently maintains local copies of security request documentation. As staff turnover occurs for Regional Security Officers, historical copies of security access request documentation are required to be transitioned to the custody of the new security officer.

As stated above, the Department will 1) perform analysis to determine the cost of potential process revisions and solutions to establish a centralized repository of security access documentation, and 2) publish an updated FSFN security profile matrix and revised field job titles document to include all security profiles available within FSFN.

Anticipated completion date: 12/31/2014.

**Finding No. 3:** The Department's periodic review of FSFN access privileges needed improvement.

**Recommendation:** The Department should, on a regular basis, perform and document a comprehensive periodic review of FSFN access privileges that includes verification of access by appropriate supervisory personnel independent of the users for whom the access verification pertains.

**Offices of Information Technology Services and Child Welfare Response:** The Department will review the statewide security policy to include a comprehensive periodic review and documentation of FSFN access privileges that includes verification of access by appropriate supervisory personnel independent of the users for whom the access verification pertains.

Anticipated completion date: 12/31/2014.

**Finding No. 4:** Contrary to State of Florida, General Records Schedule GS1-SL requirements for the retention of access control records, the Department did not retain complete FSFN access control records.

**Recommendation:** The Department should retain complete FSFN access control records as required by the General Records Schedule.

**EXHIBIT A (CONTINUED)**  
**MANAGEMENT'S RESPONSE**

**Offices of Information Technology Services and Child Welfare Response:** The practice of maintaining local paper copies of security request forms in each region can make them difficult to locate after a period of time elapses or significant staff turnover occurs. The Department will perform analysis in the next fiscal year to determine the cost of potential process revisions and solutions to establish a centralized repository of security access documentation, with the goal of eliminating the current paper process.

Anticipated completion date: 12/31/2014.

**Finding No. 5:** Contrary to Section 119.071(5)(a)2.a., Florida Statutes, the Department collected certain employee social security numbers (SSNs) for granting access to FSFN without specific authorization in law or without having established the imperative need to use the SSN for the performance of its duties and responsibilities as prescribed by law.

**Recommendation:** In the absence of establishing an imperative need for the use of employee SSNs, the Department should discontinue requiring an SSN to be provided when granting access to FSFN.

**Offices of Information Technology Services and Child Welfare Response:** The Department will review the current security policy requiring collection of SSNs as part of the security request process and determine whether this requirement is imperative for the performance of the Department's duties and responsibilities as prescribed by law.

Anticipated completion date: 12/31/2014.

**Finding No. 6:** Certain Departmental security controls related to logical access needed improvement.

**Recommendation:** The Department should improve security controls related to logical access to ensure the confidentiality, integrity, and availability of data and IT resources.

**Offices of Information Technology Services and Child Welfare Response:** Solutions to address the finding will require extensive testing and may have a technical infrastructure and cost impact. If the Department can accomplish a solution to address this finding within available resources and funds, the solution will be implemented during the next fiscal year.

Anticipated completion date: 6/30/2015.

**Finding No. 7:** The Department's program change management controls for FSFN needed improvement.

**Recommendation:** The Department should implement controls to reconcile program change requests entered in the Department's change request management system to the contractor's service requests. Additionally, the Department should improve controls related to the approval of program changes promoted to the production environment.

**Offices of Information Technology Services and Child Welfare Response:** The Department will implement controls to reconcile program change requests entered in the

**EXHIBIT A (CONTINUED)**  
**MANAGEMENT'S RESPONSE**

Department's change request management system to the contractor's service requests authorizing the work.

Anticipated completion date: 9/30/2014.

**Finding No. 8:** FSFN Adoption Assistance Program expenditure reconciliation and review procedures for Community-Based Care (CBC) agencies' payments were inadequate.

**Recommendation:** The Department should implement reconciliation and review procedures to ensure that payments to the CBC agencies for monthly adoption subsidies and one-time adoption fees are complete, accurate, and valid.

**Office of Child Welfare Response:** The Department will establish and implement reconciliation and review procedures that assist in determining the data entered and processed in FSFN matches the CBC agencies' *Monthly Actual Expenditure Reports* and accounting data. The procedures will be implemented, with a monitoring plan to provide oversight.

Anticipated completion date: 9/30/2014.

**Finding No. 9:** The Department did not enforce the CBC agencies' adherence to Department procedures and guides. Also, FSFN allowed monthly adoption subsidy payments and one-time adoption payment transactions to be entered and processed for amounts greater than allowed by applicable State law and Department rules. In addition, the CBC agencies' users were allowed to change monthly expenditure amounts circumventing established subsidy agreement processes.

**Recommendation:** The Department should implement appropriate controls to ensure that payments are within the limits established in Sections 409.166(4)(b) and (7), Florida Statutes, and Department of Children and Families Rule 65C-16.012(2), Florida Administrative Code, and are for authorized monthly expenditure amounts.

**Office of Child Welfare Response:** The Department concurs that in some cases, adoption subsidies continued after the child turned age 18. During recent design sessions for the FSFN financial module, a requirement was approved and implemented on December 15, 2013 that established an edit/control that will not allow an adoption subsidy payment to be made after the month a child turns age 18.

The Department also concurs that in some cases, a payment for adoption subsidy may have included medical assistance expenditures that should not have been included in a subsidy payment. The Department will establish a workgroup with program and budget/financial staff to develop policy and guidelines for documenting payments to adoptive parents that are not adoption subsidy payments. The guidelines will require payments that are *not* adoption subsidy payments be assigned to a new reporting category. This same workgroup will establish a monitoring plan that will include a methodology for comparing the approved adoption subsidy amounts on the subsidy agreements with the actual adoption subsidy payments.

Anticipated completion date: 9/30/2014.

**EXHIBIT A (CONTINUED)**  
**MANAGEMENT'S RESPONSE**

**Finding No. 10:** The Department had not met the Federal SACWIS compliance requirements for FSFN.

**Recommendation:** The Department should continue working with ACF to develop and implement an acceptable action plan to ensure that FSFN is SACWIS compliant.

**Office of Information Technology Services Response:** With the next major FSFN release scheduled for April 2014, the Department believes we will be in conformance with 77 of 88 SACWIS requirements, subject to federal review.

Further system enhancements are currently in design that the Department believes will achieve conformance with 87 of 88 requirements in FY2014-15.

The remaining requirement to achieve SACWIS compliance is related to the Interstate Compact on the Placement of Children (ICPC) and how that program's data is integrated with FSFN. The Department is working closely with ACF, as the federal pilot project for a National Electronic Interstate Compact Enterprise system is being planned and executed over the next 18 months. ACF is in agreement with the Department that resolution of the final SACWIS requirement related to ICPC is dependent on the results of the pilot project and guidance the Department receives from ACF during that process.

Anticipated completion date: 12/31/2015.

**Office of Child Welfare Response:** On 02/28/2014, the Department received the final report from the Administration for Children and Families, Children's Bureau, *Statewide Automated Child Welfare Information System (SACWIS) Assessment Review of the Florida Safe Families Network (FSFN)*. This report indicates that FSFN complies with all applicable SACWIS requirements or have approved action plans to resolve any outstanding issues. The final report indicates that there are 25 active action plans remaining. Consequently, the project will remain open pending successful completion of the 25 approved action plans. The State will continue to report on its progress to complete the action plans via the Annual Advance Planning Document (APD). Any needed adjustments of the timeframes set forth in the action plans, reasons for the adjustments and the revised completion dates will be provided, as appropriate, via an As-Needed AP Update.