

DEPARTMENT OF HEALTH

Florida Women, Infants, and Children (WIC)
Information System and
Electronic Benefits Transfer Data System (FL-WiSE)



Sherrill F. Norman, CPA
Auditor General

State Surgeon General of the Department of Health

Section 20.43, Florida Statutes, creates the Department of Health. The head of the Department is the State Surgeon General of the Department of Health who is appointed by the Governor, subject to confirmation by the Senate. During the period of our audit, Celeste Philip, M.D., served as State Surgeon General.

The team leader was Rebecca Ferrell, CISA, and the audit was supervised by Heidi Burns, CPA, CISA.

Please address inquiries regarding this report to Arthur Hart, CPA, Audit Manager, by e-mail at arthart@aud.state.fl.us or by telephone at (850) 412-2923.

This report and other reports prepared by the Auditor General are available at:

www.myflorida.com/audgen

Printed copies of our reports may be requested by contacting us at:

State of Florida Auditor General

Claude Pepper Building, Suite G74 • 111 West Madison Street • Tallahassee, FL 32399-1450 • (850) 412-2722

DEPARTMENT OF HEALTH

Florida Women, Infants, and Children (WIC) Information System and Electronic Benefits Transfer Data System (FL-WiSE)

SUMMARY

This operational audit of the Department of Health (Department) focused on evaluating selected information technology (IT) controls applicable to the Florida Women, Infants, and Children (WIC) Information System and Electronic Benefits Transfer (EBT) data system (FL-WiSE). Our audit disclosed the following:

Finding 1: The Department had not established procedures for the periodic review of FL-WiSE and FL-WiSE database user access privileges and did not perform periodic reviews of access privileges.

Finding 2: Certain security controls related to user authentication, user account management, and logging and monitoring need improvement to ensure the confidentiality, integrity, and availability of FL-WiSE data and related IT resources.

BACKGROUND

The Department of Health (Department) was established by State law to protect and promote the health of all residents and visitors in the State.¹ The Department is responsible for administering Federal funds received for the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) and providing clinical leadership for the Statewide WIC program.² In March 2014, the Department completed implementation of the Florida WIC Information System and Electronic Benefits Transfer (EBT) data system (FL-WiSE), which is a Web-based system that supports the WIC program services delivery and interfaces with an EBT processor to deliver client benefits. FL-WiSE has four modules: Clinic, Administration, Vendor, and State Only.

The Clinic module interfaces with the Florida Online Recipient Integrated Data Access (FLORIDA) system to determine whether a client already meets the income eligibility requirements for WIC program participation through current participation in either the Food Assistance, Medicaid, or Temporary Cash Assistance programs. As of December 2016, FL-WiSE had an estimated 1,600 users and served approximately 8,000 clients at 220 sites Statewide. The primary information technology (IT) infrastructure for FL-WiSE is hosted at the State Data Center located in Tallahassee, Florida. FL-WiSE users access the system through the Department's network.

¹ Section 20.43, Florida Statutes.

² Section 383.011, Florida Statutes.

FINDINGS AND RECOMMENDATIONS

Finding 1: Periodic Reviews of Access Privileges

Effective access controls include periodic reviews of user access privileges to data and IT resources to verify that only authorized users have access and that the access provided to each user remains appropriate and necessary for the user's assigned job duties. Agency for State Technology (AST) rules³ require agency information owners to review access rights (privileges) periodically based on system categorization or assessed risk.

Our audit procedures disclosed that Department management had not established procedures for the periodic review of FL-WiSE and FL-WiSE database user access privileges and had not performed periodic reviews of FL-WiSE and FL-WiSE database user access privileges since the implementation of FL-WiSE in March 2014. Subsequent to our inquiry, Department management established procedures that require the annual review of FL-WiSE user access privileges, effective January 1, 2017, and the review of FL-WiSE database user access privileges at least annually, effective December 16, 2016. The procedures were communicated on December 6, 2016, to supervisory personnel responsible for authorizing access to FL-WiSE and on December 16, 2016, to supervisory personnel responsible for authorizing access to the FL-WiSE database.

The absence of periodic reviews of user access privileges limits management's assurance that user access privileges continue to be authorized and appropriate and increases the risk that unauthorized disclosure, modification, or destruction of Department data and IT resources may occur.

Recommendation: We recommend that Department management continue efforts to improve access controls, including periodic reviews of FL-WiSE and FL-WiSE database user access privileges to ensure that user access privileges continue to be authorized and appropriate.

Finding 2: Security Controls – User Authentication, User Account Management, and Logging and Monitoring

Security controls are intended to protect the confidentiality, integrity, and availability of data and IT resources. Our audit procedures disclosed that certain security controls related to FL-WiSE user authentication, user account management, and logging and monitoring need improvement. We are not disclosing specific details of the issues in this report to avoid the possibility of compromising the confidentiality of Department data and IT resources. However, we have notified appropriate Department management of the specific issues.

Without appropriate security controls related to user authentication, user account management, and logging and monitoring, the risk is increased that the confidentiality, integrity, and availability of Department data and IT resources may be compromised.

Recommendation: We recommend that Department management improve certain security controls related to user authentication, user account management, and logging and monitoring

³ AST Rule 74-2.003(1)(a)6, Florida Administrative Code.

for FL-WiSE and related IT resources to ensure the confidentiality, integrity, and availability of FL-WiSE data and related IT resources.

OBJECTIVES, SCOPE, AND METHODOLOGY

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 2016 through January 2017 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 the audit findings and our conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for the audit findings and our conclusions based on our audit objectives.

This IT operational audit focused on evaluating selected IT controls applicable to FL-WiSE during the period July 2016 through January 2017. The audit included selected application controls over transaction data input, processing, output, and interfaces, and selected application-level general controls over logical access and change management. The overall objectives of the 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.
- To identify statutory and fiscal changes that may be recommended to the Legislature pursuant to Section 11.45(7)(h), Florida Statutes.

This audit was designed to identify, for the IT systems and controls included within the scope of the audit, deficiencies in management's internal controls; instances of noncompliance with applicable governing laws, rules, or contracts; and instances of inefficient or ineffective operational policies, procedures, or practices. The focus of this 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 systems and controls included within the scope of this audit, our 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 the audit; obtaining an understanding of the IT systems 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 the audit findings and our conclusions; and reporting on the results of the audit as required by governing laws and auditing standards.

This 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 contractors and, as a consequence, cannot be relied upon to identify all instances of noncompliance, fraud, abuse, or inefficiency.

In conducting this audit, we:

- Interviewed Department personnel and reviewed FL-WiSE system-related documentation to obtain an understanding of:
 - The background for FL-WiSE, including the FL-WiSE purpose and goals involving financial, operations, and compliance requirements.
 - The FL-WiSE computing platform, including applicable hardware, operating systems, and the database management system.
 - The FL-WiSE data and business process flows, including key sources of transaction data input, processing, output, and interface processing related to the system.
 - The policies and procedures for FL-WiSE processes and user responsibilities.
 - User account management processes for authorizing, creating, modifying, and revoking access to FL-WiSE, including the process for periodically reviewing access privileges.
 - Change management processes applicable to FL-WiSE, including identification of policies and procedures for change control.
- Evaluated the appropriateness of access privileges granted to:
 - 26 of the 174 FL-WiSE active users as of October 12, 2016, to determine the appropriateness of the access granted.
 - The 50 accounts defined to the Department's network domain as of November 8, 2016, and December 6, 2016.
 - The 7 accounts defined to the Department's WIC domain as of November 21, 2016.
 - The 8 database administrators for the FL-WiSE database management system as of November 10, 2016.
 - The 24 database support users for the FL-WiSE database management system as of November 10, 2016.
- Evaluated the effectiveness of logging and monitoring controls related to FL-WiSE IT resources.
- Evaluated the effectiveness of user authentication controls for FL-WiSE and related IT resources.
- Evaluated the effectiveness of FL-WiSE change management controls related to the authorization, testing, and approval of changes prior to implementation into the production environment. Specifically, we evaluated 5 of the 21 of the program changes that were implemented into the production environment during the period July 1, 2016, through September 22, 2016, to determine whether the changes were properly authorized, tested, and approved.
- Evaluated the effectiveness of data input controls related to the certification and issuance of benefits process.

- Evaluated online edits designed to ensure completion of required fields and client information to determine whether the edits were in place and operating effectively. These edits related to the:
 - Prevention of inactive or terminated WIC program participants from being determined eligible.
 - Protection of confidential and sensitive information from clear text display.
 - Prevention of benefits assignment without EBT card assignment.
 - Consideration of required criteria for eligibility (e.g., income calculation, family size, expected number of infants, certification period, and nutrition risk value).
- Evaluated the FL-WiSE, FLORIDA, and EBT processor interfaces used for determining client income eligibility and delivering client benefits to determine whether the interfaces were processed accurately, completely, and timely.
- Communicated on an interim basis with applicable officials to ensure the timely resolution of issues involving controls and noncompliance.
- Performed various other auditing procedures, including analytical procedures, as necessary, to accomplish the objectives of the audit.
- Prepared and submitted for management response the findings and recommendations that are included in this report and which describe the matters requiring corrective actions. Management's response is included in this report under the heading **MANAGEMENT'S RESPONSE**.

AUTHORITY

Section 11.45, Florida Statutes, provides that the Auditor General may conduct audits of the IT programs, activities, functions, or systems of any governmental entity created or established by law. 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.



Sherrill F. Norman, CPA
Auditor General

MANAGEMENT'S RESPONSE

Mission:

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



Rick Scott
Governor

Celeste Philip, MD, MPH
Surgeon General and Secretary

Vision: To be the Healthiest State in the Nation

May 8, 2017

Ms. Sherrill F. Norman, CPA
Auditor General
Room G74, Claude Pepper Building
111 West Madison Street
Tallahassee, FL 32399-1450

Dear Ms. Norman:

We are pleased to respond to the preliminary and tentative audit findings and recommendations concerning the Office of the Auditor General's information technology operational audit of the *Department of Health Florida Women, Infants, and Children (WIC) Information System Electronic Benefits Transfer Data System (FL-WiSE)*. Our response to the findings is enclosed, as required by Section 11.45(4)(d), *Florida Statutes*.

We appreciate the efforts of you and your staff in assisting to improve our operations and information systems. Please contact our Inspector General, James D. Boyd, by calling (850) 245-4141 should you have any questions.

Sincerely,

Celeste Philip, MD, MPH
Surgeon General and Secretary

CP/mhb
Enclosure

cc: James D. Boyd, CPA, MBA, Inspector General
Kelli T. Wells, MD, Deputy Secretary for Health
Cindy Dick, MBA, CPS, Assistant Deputy Secretary for Health

Florida Department of Health
Office of the State Surgeon General
4052 Bald Cypress Way, Bin A-00 • Tallahassee, FL 32399-1701
PHONE: 850/245-4210 • FAX: 850/922-9453
FloridaHealth.gov



Preliminary and Tentative Findings



Report Number: To be determined
 Report Title: *Department of Health Florida Women, Infants, and Children (WIC) Information System Electronic Benefits Transfer Data System (FL-WiSE)*
 Report Date: To be determined

No.	Finding	Recommendation	Management Response	Corrective Action Plan
1.	The Department of Health (Department) had not established procedures for the periodic review of FL-WiSE and FL-WiSE database user access privileges and did not perform periodic reviews of access privileges.	We recommend that Department management continue efforts to improve access controls, including periodic reviews of FL-WiSE and FL-WiSE database user access privileges to ensure that user access privileges continue to be authorized and appropriate.	We concur.	<p>Completed.</p> <p>Management has established a written procedure for an annual review for all FL-WiSE user accounts. The annual review of system access is now required, in addition to complying with the requirement to submit the FL-WiSE <i>Access Authorization Request</i> form for newly assigned personnel, the <i>Delete FL-WiSE Access Request</i> form for personnel leaving WIC, and the <i>Network Access Request Form</i> for personnel arriving and leaving WIC. Required validation steps are also included.</p>
2.	Certain security controls related to user authentication, user account management, and logging and monitoring need improvement to ensure the confidentiality, integrity, and availability of FL-WiSE data and related information technology (IT) resources.	We recommend that Department management improve certain security controls related to user authentication, user account management, and logging and monitoring for FL-WiSE and related IT resources to ensure the confidentiality, integrity, and availability of FL-WiSE data and related IT resources.	We concur.	<p>Completed.</p> <p>Management has implemented a number of improved best practices addressing this requirement.</p>