

LEGISLATIVE AUDIT DIVISION

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MEMORANDUM

TO: Legislative Audit Committee Members

FROM: Aubrey J. Curtis, Information Systems Auditor

DATE: June 2015

CC: Richard Opper, Director, DPHHS
Marie Matthews, Operations Services Branch Manager, DPHHS
Stuart Fuller, Chief Information Officer, DPHHS
Becky Schlauch, Business and Financial Services Division Administrator, DPHHS
Todd Harwell, Public Health and Safety Division Administrator, DPHHS
Dale McBride, Financial Services and Operations Bureau Chief, DPHHS
Karin Ferlicka, State Registrar, DPHHS

RE: Information Systems Audit Follow-Up 15SP-07; *Vital Statistics Information Management System* (orig. 13DP-02)

ATTACHMENTS: Original Information Systems Audit Summary

Introduction

The *Vital Statistics Information Management System* (13DP-02) audit report was issued to the Committee in January 2014. The audit included six recommendations to the Department of Public Health and Human Services (DPHHS). In May 2015, we conducted follow-up work to assess implementation of the report recommendations. This memorandum summarizes the results of our follow-up work.

Overview

The overall objective of the audit was to determine if program controls exist to maximize the data integrity of the *Vital Statistics Information Management System* (VSIMS), focusing on birth and death certificates. It was discovered that controls, as well as processes, associated with VSIMS could be improved to maximize integrity and efficiencies. DPHHS concurred with all six recommendations. From the information obtained during the follow-up, DPHHS has implemented five recommendations and has partially implemented one recommendation.

Background

Vital statistics is data related to live births, deaths, fetal deaths, marriages, and divorces. The VSIMS is a database, which includes a web-based interface, that stores and disseminates vital records of Montana state residents. Information during births and deaths are typically annotated on a hardcopy form initially, then later entered into the system. At that time, the record is considered electronically registered with the Office of Vital Statistics.

Follow-up Audit Results

The following sections summarize the progress toward implementation of the report recommendations. Interviews were conducted with the Office of Vital Statistics and the Technology Services Bureau within DPHHS, along with the collection of supporting documentation, in order to verify what steps have been taken to implement recommendations.

RECOMMENDATION #1

We recommend the Department of Public Health and Human Services include all users in its six-month user review process for the Vital Statistics Information Management System.

Implementation Status – Implemented

Since our audit, DPHHS has written new policy on user access review of VSIMS. All users of the system, including DPHHS staff, are included in the six-month user review conducted by the Office of Vital Statistics. The users, or supervisors, are contacted via mail with a letter explaining the process and a list of the VSIMS accounts associated with that organization which are due to expire. The user, or supervisor, must indicate on the user list whether the account is “OK” or to “remove” the user from the list and delete his/her account. With the inclusion of government employees in the user review, an additional 89 offices are contacted every 6 months. The reason for using mail versus electronic mail (email) as the means of communication was that users’ email addresses may routinely change and standard mail is more reliable since physical/mailling addresses do not change as often.

RECOMMENDATION #2

We recommend the Department of Public Health and Human Services:

- A. Further examine roles within the Vital Statistics Information Management System and limit full administrative permissions to only the individuals who require that capability.**
- B. Develop a means within the Vital Statistics Information Management System to provide assurance that documentation prescribing the cause of death on death certificates has been provided by medical personnel.**

Implementation Status – Implemented

- A. During the audit, it was discovered that all employees of the Office of Vital Statistics had full administrative privileges within VSIMS. While some individuals’ job responsibilities did not indicate that this elevated user role was required, it was necessary in order to accomplish certain tasks in the system that were asked of them. In order to ensure that internal users do not have system permissions which are greater than their position description dictates, DPHHS worked with the contractor of VSIMS to develop another user role which allows view and search capability that are necessary for certain employees within the Office of Vital Statistics, but does not grant full administrative permissions.
- B. A concern during the audit was how the cause of death for death certificates was transcribed into VSIMS. Standard practice is for the individual(s) responsible for final disposition of a body (commonly the funeral home or crematorium) to initiate the death certificate. A hardcopy form is created and faxed to the physician or medical examiner in order to prescribe the cause of death for the deceased. Once that is accomplished, the form is faxed back to the initiator, and the information is transcribed into VSIMS. In order to ensure that the proper documentation has been provided and kept for record, DPHHS worked with the contractor to add a field within VSIMS verifying that the certifier of the death certificate (if they are not also the pronouncer of death) transcribed the cause of death from information provided by a physician or medical examiner and is on file.

RECOMMENDATION #3

We recommend the Department of Public Health and Human Services require all users to reset account passwords after a given amount of time to comply with state policy.

Implementation Status – Implemented

DPHHS brought the system into compliance with state policy by requesting the contractor of VSIMS build into the system the capability to force internal users to change their password every 60 days, and external users to change their password every 6 months. In addition, passwords must follow policy in regards to complexity. This system enhancement was migrated to production on March 13, 2015.

RECOMMENDATION #4

We recommend the Department of Public Health and Human Services develop and implement procedures to monitor the activity of users with administrative rights within the Vital Statistics Information Management System on a regular basis.

Implementation Status – Implemented

DPHHS created policy requiring the vital records supervisor review a random sample of 32 events of each category (acquisitions, data entry corrections, amendments, and adoptions) from the change log of VSIMS every two weeks to ensure that users with administrative rights in the Office of Vital Statistics are making changes in accordance with all applicable policies and procedures. The vital records supervisor reports any discrepancies to the state registrar, who then addresses the matter with the system user involved. If necessary, the vital records supervisor and the state registrar work together to determine a corrective action.

RECOMMENDATION #5

We recommend the Department of Public Health and Human Services ensure that processes and procedures related to the release of death record information are consistent with departmental policy.

Implementation Status – Implemented

DPHHS has taken steps to bring policy in line with common operating procedures. During the audit, it was discovered that DPHHS policy was more restrictive than what was in statute with regards to the provision of datasets for the use of public health and research. DPHHS has since edited its policy to reflect that death record information, without personal health information, is public knowledge and releasable without a research agreement requiring confidentiality.

RECOMMENDATION #6

We recommend the Department of Public Health and Human Services utilize the internal capabilities of the Vital Statistics Information Management System to automate processes and increase efficiency.

Implementation Status – Partially Implemented

DPHHS has made efforts to streamline its system access request process for internal users. Staff implemented procedures which utilize submittal of OM-300A System/File Access Request forms via email. DPHHS indicated they would "...continue its analysis of the VSIMS to determine if additional processes can be made paperless and/or more automated. VSIMS will be enhanced as appropriate and as funding allows." To date, no modifications to the system itself have been made which eliminate inefficiencies identified during the audit, such as mailing notifications to users.