



A REPORT  
TO THE  
MONTANA  
LEGISLATURE

INFORMATION SYSTEMS AUDIT

*Vital Statistics  
Information Management  
System*

*Department of Public Health and  
Human Services*

JANUARY 2014

LEGISLATIVE AUDIT  
DIVISION

13DP-02

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**INFORMATION SYSTEMS AUDITS**

Information Systems (IS) audits conducted by the Legislative Audit Division are designed to assess controls in an IS environment. IS controls provide assurance over the accuracy, reliability, and integrity of the information processed. From the audit work, a determination is made as to whether controls exist and are operating as designed. We conducted this IS audit 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. Members of the IS audit staff hold degrees in disciplines appropriate to the audit process.

IS audits are performed as stand-alone audits of IS controls or in conjunction with financial-compliance and/or performance audits conducted by the office. These audits are done under the oversight of the Legislative Audit Committee which is a bicameral and bipartisan standing committee of the Montana Legislature. The committee consists of six members of the Senate and six members of the House of Representatives.

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January 2014

The Legislative Audit Committee  
of the Montana State Legislature:

This is our information systems audit of the Vital Statistics Information Management System (VSIMS) managed by the Office of Vital Statistics in the Department of Public Health and Human Services.

This report provides information regarding the integrity of the data located within the VSIMS. This report includes recommendations for enhancing program and system controls related to access, monitoring of user activity, data output, and automating processes.

We wish to express our appreciation to personnel from the Department of Public Health and Human Services involved with the audit for their cooperation and assistance.

Respectfully submitted,

*/s/ Tori Hunthausen*

Tori Hunthausen, CPA  
Legislative Auditor



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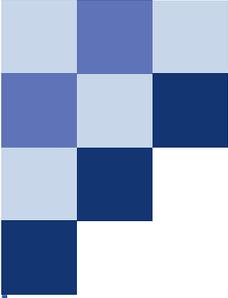
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# MONTANA LEGISLATIVE AUDIT DIVISION

## INFORMATION SYSTEMS AUDIT

### Vital Statistics Information Management System

Department of Public Health and Human Services

JANUARY 2014

13DP-02

REPORT SUMMARY

Vital records directly affect the lives and benefits of all present and former Montana residents. Failure to protect vital records information could affect federal and state services to Montana citizens. The audit team identified areas which could be strengthened to maximize the integrity of vital statistics data and records.

### Context

The Vital Statistics Information Management System (VSIMS) is a web-based application used for managing vital records such as birth and death certificates. The system is operated by the Office of Vital Statistics (OVS) within the Department of Public Health and Human Services. There are approximately 2,000 users who access the system on a daily basis to enter new vital records, review existing information, and issue certified copies of certificates.

As described in §50-15-122, MCA, it is the policy of the state to protect the integrity of vital records and vital reports, to ensure their proper use, and to ensure the efficient and proper administration of the system of vital statistics. The audit focused on controls related to access including assignment, permissions, and monitoring; input validations and edits to ensure data integrity; and protection of data output.

### Results

From the audit work conducted, we concluded OVS has incorporated controls within VSIMS; however, some procedures could be strengthened. The following is an overview of the areas that include recommendations for improvements:

- ◆ Six-month user review process should be updated to include all users.
- ◆ Creation and assignment of application roles – should be reviewed to ensure only required access is granted.
- ◆ User account passwords – need to ensure users reset passwords regularly.
- ◆ User monitoring – should establish a process for ongoing review of users with administrative rights.
- ◆ Release of death record data – protocol needs to be consistent with policy.
- ◆ Use of automation – should analyze processes and use automation where possible to increase efficiencies.

Recommendation Concurrence	
Concur	6
Partially Concur	0
Do Not Concur	0
<b>Source: Agency audit response included in final report.</b>	

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# Chapter I – Introduction

## **Introduction**

Based on recommendations to obtain information from death records made in previous audits to other state agencies, the Legislative Audit Division reviewed data integrity of the Vital Statistics Information Management System (VSIMS) which stores and disseminates vital records. Data integrity can be defined as the overall completeness, accuracy, and consistency of data. Vital statistics is a large, complex, and widely dispersed program that directly affects the lives and benefits of all present and former Montana residents. If the data contained within the system is either inaccurate or compromised, the repercussions to the individual, and likely the state, could be costly. This report provides information on VSIMS and findings from our review of controls around the system.

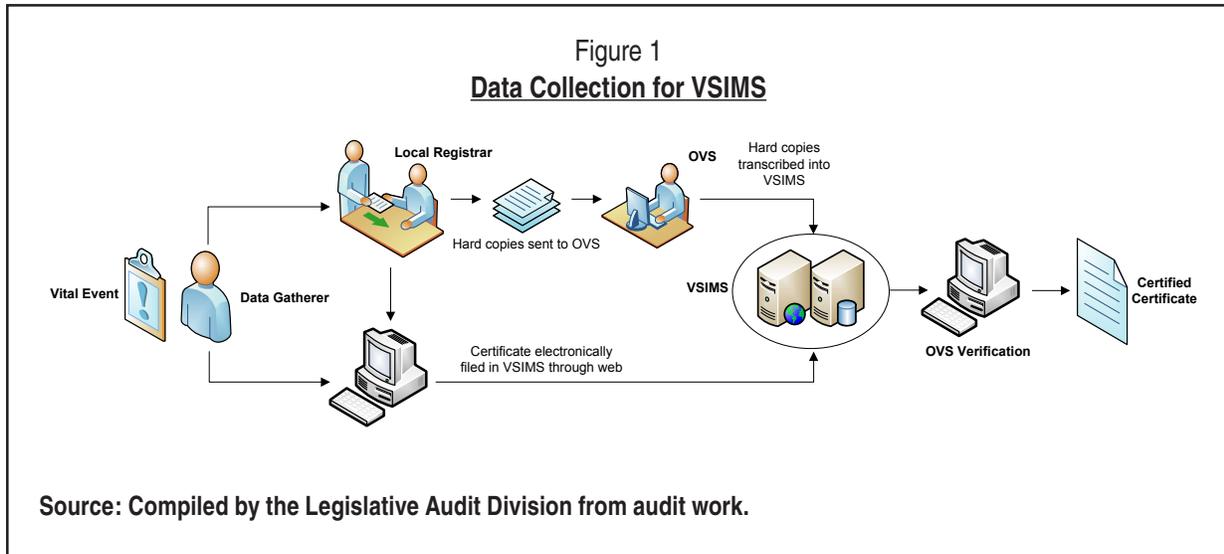
## **Background**

Vital statistics are statistics on live births, deaths, fetal deaths, marriages, and divorces. After a vital event occurs, information is collected from family members, physicians and/or morticians, and other witnesses using standard forms. This information is transcribed into VSIMS and the record is then considered electronically registered with the Office of Vital Statistics (OVS).

VSIMS is a web-based system built around an Oracle database platform. The system was developed and is maintained by contractor personnel. The six modules that make up the Internet-based system are:

- ◆ Electronic Birth Registration
- ◆ Electronic Death Registration
- ◆ Certificate Request Receipting
- ◆ Remote Certificate Issuance
- ◆ Adoption Processing
- ◆ Vital Record Administration

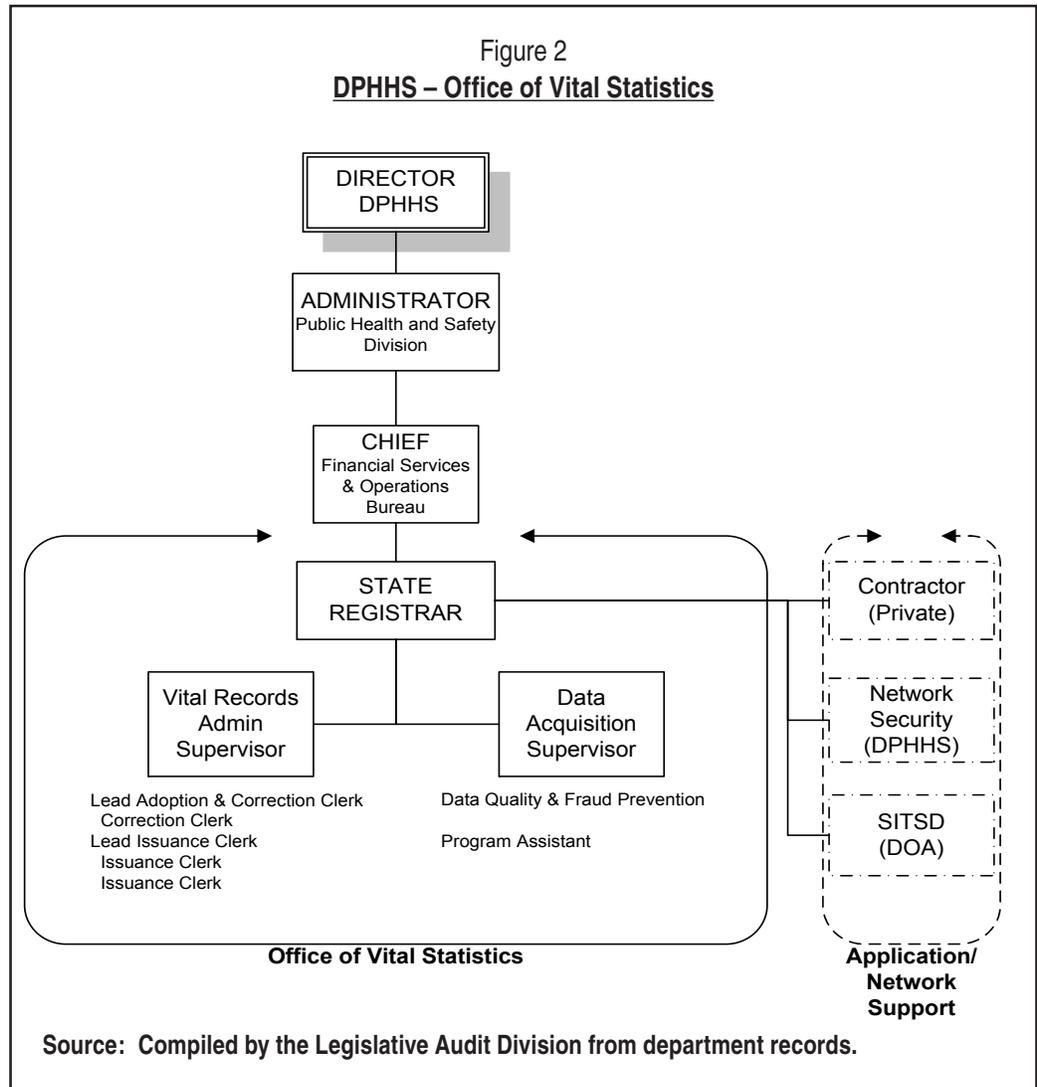
Data for birth and death registration are entered at the time of the event. Typically, information is provided by parents and physicians for birth. For death, information is obtained from physicians, coroners, and morticians. Once all information is gathered, a certificate is electronically filed with OVS, and is then available to the county registrar and county clerk and recorder. The state office and county clerk and recorder offices can issue certified copies of birth and death certificates directly from VSIMS. The figure below shows the data collection and input process of vital information into VSIMS.



If a local registrar or other user does not have access to a computer or Internet services, the VSIMS is supplemented by a paper system. The paper forms are completed and sent to OVS for registration in VSIMS. According to the Department of Public Health and Human Services (DPHHS), approximately 2 percent of all births and 6 percent of all deaths in Montana are processed using paper forms and sent to OVS for registration.

Vital records are created almost daily and are used by a multitude of individuals and groups. Once vital records have been electronically certified, any changes to information must be made through a formal request to the department and only department personnel can make approved changes. All records from Montana are transmitted to the federal government for inclusion in the national vital records database. Research groups, law enforcement agencies, university personnel, and other entities use vital records for research and analysis purposes related to births and deaths in Montana, and must make formal requests to the department to obtain vital information.

All changes and maintenance operations in the application, including updates/patches, are performed by a third-party contractor after approval from the State Registrar. There are no system administrators for VSIMS within OVS. DPHHS Network Security and the Department of Administration (DOA) State Information Technology Services Division (SITSD) provide network and database support, but the functionality of the VSIMS application is the responsibility of the contractor. The initial contract for the VSIMS project expired during the audit period and a new contractor was hired to take over maintenance responsibilities. The following figure shows the organization for OVS.



## Audit Scope and Objective

The audit focused on processes and procedures for issuing and maintaining birth and death certificates. The subject areas that were not examined during the audit were fetal death, adoption, marriage, and divorce. The overall objective of the audit was to determine if program controls exist to maximize the integrity of VSIMS data. The following are the control areas that were examined to meet the audit objective:

- ◆ **Access/Roles** – Determine whether proper roles are assigned to all users of VSIMS, and verify that these users have a business need for access to the system.
- ◆ **System Monitoring** – Determine whether procedures include monitoring of the system and the activity of users.
- ◆ **Input Validations** – Determine whether there are edits incorporated into the system to help minimize incomplete data.

- ◆ **Information Security** – Determine whether there is oversight of the customers who request and are provided information from the system.

## **Methodology**

Steps taken to meet our objective included the following:

- ◆ Interviews with department personnel, as well as a sample of VSIMS users.
- ◆ Review of associated federal regulations and state laws, rules, and policies, as well as system manuals.
- ◆ Review of system development and maintenance contracts.
- ◆ Observation of system operation.
- ◆ Review and analysis of the VSIMS user list and associated roles and job descriptions.
- ◆ Examination of VSIMS activity logs.
- ◆ Testing of the VSIMS database and associated system edits.
- ◆ Review of research agreements/contracts.

## **Conclusion**

Based on the audit work performed, OVS has established controls for VSIMS; however, improvements could be made in certain areas in order to ensure maximum integrity of VSIMS data.

## Chapter II – System Controls

### Introduction

Users can access the Vital Statistics Information Management System (VSIMS) via a secure web site using a standard Internet browser. Users are responsible for entering vital records information into VSIMS. Department of Public Health and Human Services (DPHHS) personnel are responsible for reviewing and approving all information entered into the system. Once information is electronically registered in VSIMS, department personnel are responsible for issuing certified copies of certificates, reviewing and approving proposed changes to certificates, and disseminating information to the federal government and other requesters. The department works with a third-party contractor to maintain system operations.

The control areas we inspected during the audit included access, input, processing, and output. These system controls are essential for data integrity due to the sensitivity of the information housed within the system, such as personally identifiable information (PII) and personal health information (PHI).

### Access Controls

DPHHS personnel are responsible for assigning access to VSIMS. VSIMS has approximately 2,000 users who can access the system on a daily basis. The Office of Vital Statistics (OVS) is responsible for system operation and has 10 users, and there are almost 650 other government employees with access. These employees include colleagues within DPHHS, personnel of other state agencies, and some federal employees as well. The remaining users reside outside of state and federal government. Common nongovernmental personnel who regularly access the system are funeral home employees, physicians/hospital employees, coroners/medical examiners, county registrars, and county clerk and recorders.

Each user is assigned a specific role to access the system. These application roles provide another layer of control by limiting the amount of operability each user has within VSIMS. There are currently 28 application roles within the birth and death modules that can be assigned. About half of the total population of users have roles that allow read-only access. Included in the other half are key personnel who have administrative roles assigned, allowing them elevated rights within the system. In addition, user IDs and passwords are required for added security measures.

## User Access Requests

Individuals requiring access to VSIMS must first submit a User Access Request form to OVS. The approving authority for all state affiliated agencies is the State Registrar. All nonstate agency user requests are directed to the Data Acquisition Supervisor. If approved, the documentation is forwarded to DPHHS Network Security to grant access to the system. Once a user has access to the database, Network Security applies a specific application role assigned by the State Registrar.

Every six months there is a review of user accounts in the system. The State Registrar and the Data Acquisition Supervisor compare manual user lists to the database user list generated by Network Security. The purpose of the review is to determine if there are any users who no longer require access to VSIMS. Notifications are sent via postal service requesting supervisors to review the users within their agency/organization and respond in writing to either retain, delete, or add users. The forms required for deleting and adding users are included with the notification. The six-month user review only includes those users who are nongovernment. According to OVS, government employees are omitted from the review because policy requires supervisors to inform OVS of any personnel that no longer require access. This policy is only applicable to state employee and does not take into account the federal employees that have access.

We selected a sample of 25 users (government and nongovernment) to confirm they are still currently employed by the state or working for the agency identified on the list. We noted four discrepancies and contacted OVS and Network Security to either corroborate or discount our findings. Three out of the four discoveries were administrative errors. However, we noted one active user employed with the Social Security Administration who had changed positions within the agency and no longer required access to VSIMS. According to Network Security, the user was still listed as active on the user account list and currently had access to VSIMS. Because this person was a government user, they were not part of the six-month review, and thus did not receive a change request notification. While policy requires users within state government to inform OVS of position changes, it does not ensure every government user (state or federal) will be identified.

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### **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.*

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## User Roles

As stated above, all access requests are reviewed and roles or permissions are assigned based on a determination by the State Registrar or the Data Acquisition Supervisor. There is no documented criteria on how application roles are assigned. All users in OVS are assigned an administrative role. This gives them capabilities to accomplish all responsibilities required of their job, such as being able to view entire birth certificates or search for marriage records within the system. However, they also have the same administrative rights as the State Registrar who is responsible for oversight and management of the entire system. Essentially, this allows all personnel in OVS the capability to create, amend, and issue vital records, which are beyond the responsibilities of their jobs. This situation has been recognized by the State Registrar as a system control risk, and a request to change the role to reflect OVS staff job requirements has been submitted to the contractor. By the end of the audit, the contractor had not yet addressed the request.

As part of the audit, we reviewed a sample of users to determine if permissions associated with the application roles were based on business need of the position. Of the nongovernment users examined, there were no individuals assigned a role that differed from their job/position title (i.e. a funeral home employee assigned a physician role). However, we determined that funeral home supervisors have the capability to enter in the cause of death for deceased individuals, and it is common practice to do so. Section 50-15-403 (2), MCA, states:

The person in charge of disposition of the dead body or fetus shall present the death certificate to the certifying physician, the certifying advanced practice registered nurse, or the coroner having jurisdiction for medical certification of the cause of death. The medical certification must be completed by the physician, the advanced practice registered nurse, or the coroner within the time frame established by the department by rule. The person in charge of disposition shall obtain the completed certification of the cause of death from the physician, the advanced practice registered nurse, or the coroner and shall, within the time that the department may prescribe by rule, file the death or fetal death certificate with the local registrar in the registration area where the death occurred or, if the place of death is unknown, where the dead body was discovered.

A funeral home or crematorium director typically is the person in charge of disposition of a body and who initiates the death certificate on paper. The demographic information is filled out, and the form is faxed to the physician/nurse or coroner/medical examiner for cause of death certification. Once cause of death is determined, the form is completed and faxed back to the funeral home or crematorium. The entire death certificate (including cause of death) is transcribed into VSIMS by funeral home/

crematorium staff. When the certificate is validated by OVS, it becomes the official record for issuance. So the permissions granted to funeral homes and crematoriums do not align with industry best practices, and were an area of concern expressed by the funeral home directors/supervisors we interviewed because cause of death does not fall under their purview. The issue relates to the differences between the electronic process and the hard copy submittal of certificates. However, according to DPHHS, requiring physicians to directly enter in the cause of death within VSIMS would be met with some resistance and could possibly slow the process of completing death certificates within the time frame allotted. Because user roles cannot be restricted to job duties, a compensating control should be implemented for validation by the person in charge of disposition to affirm that documentation certifying cause of death has been provided by medical personnel.

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### ***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.*
- 

## **Account Passwords**

In addition to assigning access, each user has a unique login identification and password. Unique IDs and passwords are common security controls to help ensure only authorized users have system access. VSIMS also has a login security feature that locks out a user after several failed attempts. During interviews with OVS staff, we noted users of VSIMS are not forced to change their password after initial login. This is only a recommended step within the user manual. Within OVS, we noted two users that have not changed their password since the inception of the birth and death issuance module in the system, dating back to 2005. According to state policy, external user passwords are to "...be changed every six months or at the next login time if previous login time is greater than six months." For internal users, policy requires that "Passwords will be changed at least every 60 days." While reset controls are commonly programmed into systems to force users to change passwords, OVS has not implemented this type of functionality. If this function was implemented into the system, it would provide stronger access control and could help minimize potential password sharing.

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**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.*

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**Input Controls**

The primary questions concerning input to VSIMS are whether controls are in place to minimize the potential for input error, and to detect unauthorized or malicious activity within the system. Controls in these areas within an information system are essential in assisting in the duties of the program manager and ensuring data integrity.

**Validations and Edits**

VSIMS is programmed with system validations and edits to help improve data integrity. A system validation is a process of checking data entered against a set of pre-defined, configurable rules. These rules, also known as edits, may be federal and/or state requirements, business rules, or rules to ensure that data is internally consistent, valid, and complete. An example of this would be if a birth mother was only 21 years old and had an education entered higher than a Bachelor's Degree. In addition, the system has validations to minimize missing, conflicting, or erroneous dates (i.e. birth entered as a date after the date of death, age over 135 years, etc.). During entry of vital record information, the system completes an initial verification for any missing or erroneous data and alerts the user to enter or change information before being allowed to proceed with certificate processing.

We observed and tested the functionality of internal system validations and edits by creating fictitious birth and death certificates within the test database. The test database is a replica of the production database and is updated weekly. The results of our testing indicated all known validations and edits are working as expected.

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**CONCLUSION**

*The validations and edits embedded in the Vital Statistics Information Management System function as anticipated and help limit the probability of submitting a certificate that is incomplete or includes erroneous data.*

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## User Monitoring

Currently, there is no departmental policy regarding monitoring of user activity. OVS supervisors can access a user activity log within the application; however, the only data provided for monitoring purposes is user account maintenance and log-in times. There is also a change log, which shows changes made to a given certificate, but these changes are not tied to a particular user in the system for accountability. According to the National Institute of Standards and Technology, information systems should include internal monitoring and monitoring should include observation of events occurring within the information system. This includes monitoring of system accounts, as well as monitoring of privileged role assignments. Due to the inability of VSIMS to provide user activity reports and a lack of user monitoring, combined with the fact that application roles are not precisely defined for each user, there is vulnerability in controls related to data integrity. While risk is mitigated for external users who must submit a change request or amendment in order to make changes to existing vital records, internal DPHHS users have elevated rights and can make changes to records, or create new records, without oversight. Without consistent monitoring of these users, inaccurate or fraudulent records could be created, either accidentally or purposefully, and go unnoticed.

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### ***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.*

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## Output Controls

DPHHS Office of Epidemiology and Scientific Support (OESS) provides statistical information to federal and state agencies, as well as outside entities such as research groups at universities. In order to obtain vital statistics data, a person must make a formal request to OESS. Each requestor must state whether or not they will need personally identifiable information (PII) or personal health information (PHI), which is considered confidential. Birth and death records both contain PII and PHI. If PII or PHI is required, the requestor must justify the need in an application (agreement). Montana law, §50-15-122(2), MCA, states the following:

The execution of a research agreement that protects the confidentiality of the information provided to a researcher in response to a written request is required for disclosure of information that may identify a person or

institution named in a vital record or report. This agreement must be made in compliance with this chapter or rules adopted to implement this chapter. Each agreement must prohibit the release by the researcher of any information that might identify a person or institution, other than releases that may be provided for in the agreement.

This law also states it is the policy of the state to protect the integrity of vital records and vital reports, to ensure their proper use, and to ensure the efficient and proper administration of the system of vital statistics. Administrative Rule, ARM 37.8.126 section (1), goes further by stating that anyone who submits a completed state-approved application shall provide proof of identification before obtaining a certified or noncertified copy of a vital record. In addition, the Policy and Procedure for Access to Vital Records Data for Research or Governmental Purposes provided by OESS says “while death certificates and death records are exempt from most confidentiality restrictions, a copy of the research protocol and a research application are still necessary.”

In order to determine if vital statistics information is being properly protected, we reviewed a sample of requests. Based on our review, there is a disconnect between OESS procedure and departmental policy as to whether or not an application is required for death lists or death records with identifiable information included. According to OESS personnel, if there is no medical data (PHI) included in the information provided, then it is considered public knowledge and is releasable without a research agreement. This is also the direction provided to OESS by OVS. However, this standard followed by OESS is contradictory to DPHHS policy, which requires an agreement for all death certificates and records.

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**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.*

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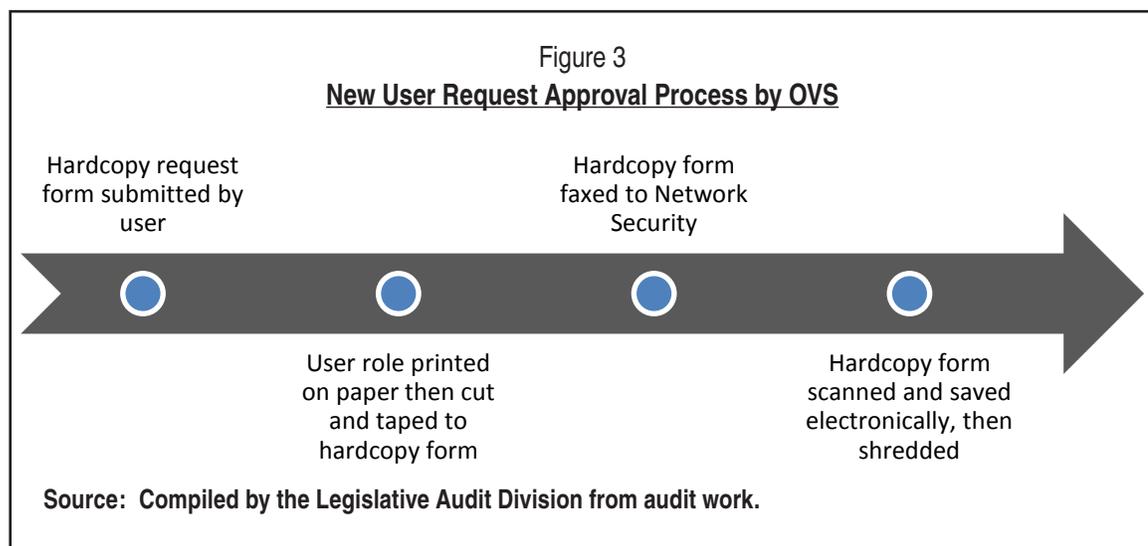
## Chapter III – Automation of Processes

### Introduction

During the course of audit work, we determined that while the Office of Vital Statistics (OVS) has made strides in improving accessibility and efficiency through the implementation of the Vital Statistics Information Management System (VSIMS), there are internal practices that could be updated in order to make additional gains. The subject areas below are two examples of processes and procedures that could benefit from automation through available tools and capabilities.

### New User Requests

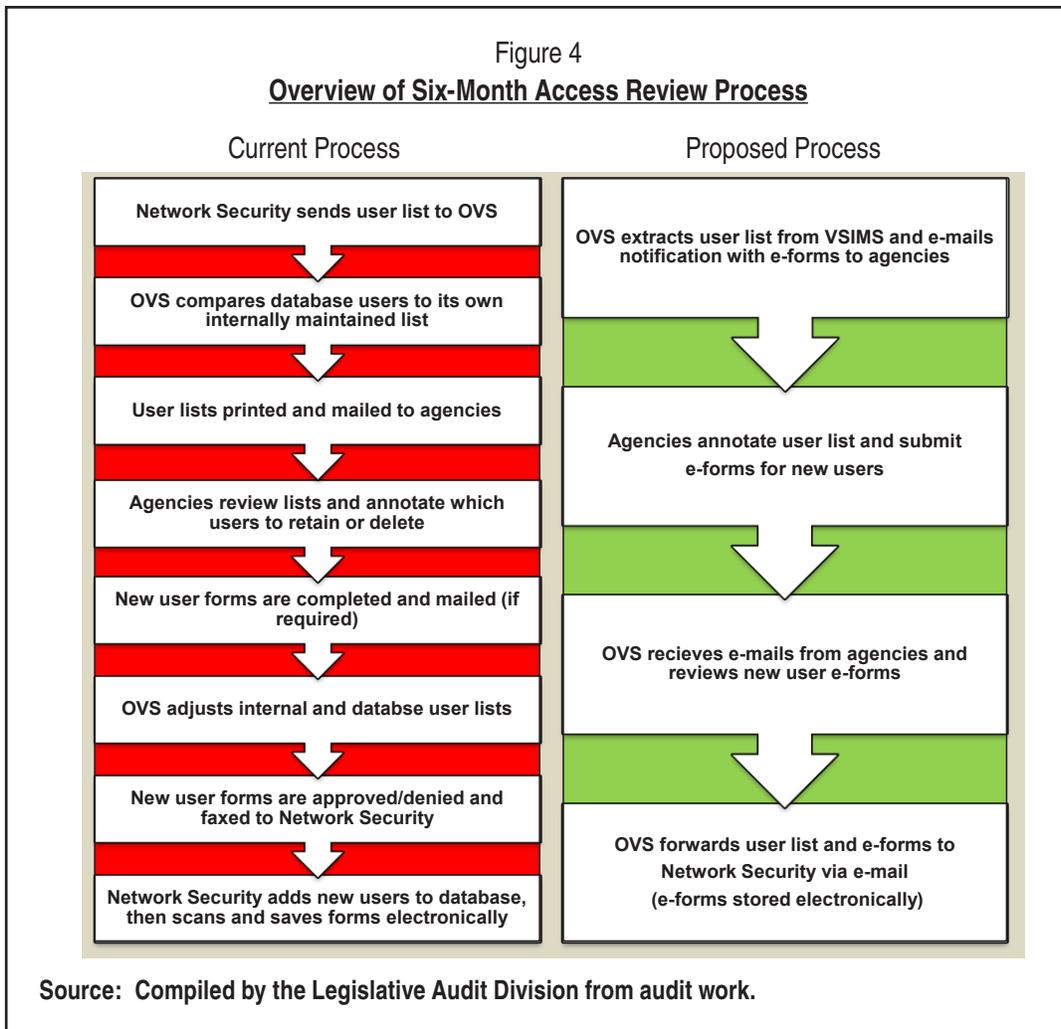
Users are added and removed from VSIMS almost on a daily basis. The current process for adding a new user can be somewhat lengthy. All access request forms must be approved and signed by the State Registrar or the Data Acquisition Supervisor. The forms are reviewed to make sure they are completed properly and that the individual has a need for access to VSIMS. Once approved, the forms are faxed to Department of Public Health and Human Services (DPHHS) Network Security. Network Security provides database access to the individual and issues a user number. The application roles assigned by OVS are also applied to user accounts by Network Security and all documentation is then stored electronically. By using hard copy forms, the steps taken by OVS staff are cumbersome and time-consuming. The figure below illustrates the process.



The utilization of electronic forms and e-mail would eliminate the exchange of hardcopy forms and regular mail, which could streamline this and other internal processes.

### Six-Month User Review

As part of the six-month user review, OVS sends written notifications out to users via mail. Included with the letter is a list of users within each agency/organization that currently have access to VSIMS. Each agency or organization must indicate whether or not each individual needs to be retained or deleted, as well as request additional users if necessary. Copies of the user request form are included as well and must be completed and returned if there are users deleted from or added to the list. After a given amount of transit time with the postal service, the return letters and forms are received and OVS updates the database user spreadsheet from Network Security as well as their own internal user lists. The entire process for the six-month review takes approximately 21 days. This method of adding users to the system is somewhat antiquated. The VSIMS provides the capability to e-mail users, which would be an efficient alternative to mailing notifications. Since the user lists and forms are maintained electronically, they in turn could be transmitted electronically. Figure 4 depicts the steps taken to complete the user access six-month review process and a potential process utilizing electronic forms and e-mail (Figure 4).



This is just one possibility. If controls over access are strengthened, another possibility is to automate this process through VSIMS by setting expiration dates for user access, then having authorized personnel request retention, deletion, and addition via the system. An additional benefit from setting user access to expire is better control over approved system users. Changes to VSIMS would need to be implemented for this option, which would require funds to complete.

The aforementioned are just a few examples that could be implemented. OVS has operated primarily using hard copy documents and certain processes are still performed in this manner. DPHHS is performing a business process analysis to help identify areas that could benefit from efficiency gains. At the completion of this audit, this review had not yet been completed.

By using available tools and capabilities, OVS could eliminate some of the steps involved to complete the process and operate more efficiently. This would allow additional time for staff to be able to focus more on other job responsibilities.

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***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.*

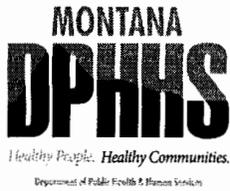
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DEPARTMENT OF PUBLIC  
HEALTH AND HUMAN  
SERVICES

DEPARTMENT RESPONSE





A-1  
**Department of Public Health and Human Services**

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**Steve Bullock, Governor**

**Richard H. Opper,  
Director**

January 21, 2013

Tori Hunthausen  
Legislative Auditor  
Legislative Audit Division  
Room 160, State Capitol Building  
PO Box 201705  
Helena, Montana 59620-1705

RECEIVED

JAN 22 2014

LEGISLATIVE AUDIT DIV.

Dear Ms. Hunthausen:

The Department of Public Health and Human Services has reviewed the Information Services Audit on the Vital Statistics Information Management System. Our responses and corrective action plans for each recommendation are provided below.

**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.

*Response: Concur*

*Corrective Action: The Department of Public Health and Human Services will update our policy to include all users in the review process.*

*Planned Completion Date: April 2014*

**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 certificated has been provided by medical personnel.

*Response: Concur*

*Corrective Action:*

- A. *The Department of Public Health and Human Services is currently reviewing staff access to the Vital Statistics Information Management System and will determine the appropriate level of access for each employee and will enhance VSIMS to allow for different levels of access.*
- B. *The Department of Public Health and Human Services will enhance the Vital Statistics Information Management System to include a required field to provide assurances that documents prescribing the cause of death have been provided by medical personnel.*

*Planned Completion Date: 7/1/14*

**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.

*Response: Concur*

*Corrective Action: The Vital Statistics Information Management System will be enhanced to allow for the system to force users to change their passwords to comply with state policy.*

*Planned Completion Date: 9/1/14*

**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.

*Response: Concur*

*Corrective Action: Office of Vital Statistics will review the Vital Statistics Information Management System change log on a regular basis to verify and monitor the activity of users with administrative rights.*

*Planned Completion Date: 1/31/14*

**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.

*Response: Concur*

*Corrective Action: The Department of Public Health and Human Services will review the processes and procedures relating to the release of death record information and make appropriate changes to ensure department policy is followed.*

*Planned Completion Date: 7/1/14*

**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.

*Response: Concur*

*Corrective Action: The Technology Services Division staff will be reviewing with the Vital Statistics Information Management program and Department of Public Health and Human Services legal staff the exact requirements for the Vital Statistics Information Management System to see if we can move to a paperless and more automated process. The proposed process in the audit is something we will be evaluating and will determine if we can implement.*

*Planned Completion Date: 9/1/14*

We appreciate the effort that your staff put into this audit and look forward to using these recommendations to improve the Vital Statistics Information Management System.

Sincerely,



Richard H. Opper, Director  
Department of Public Health and Human Services

Cc.

Jane Smilie  
Dale McBride  
Karin Ferlika  
Shannon McDonnald  
Stuart Fuller  
Becky Schlauch