



FLORIDA DEPARTMENT OF HEALTH
OFFICE OF INSPECTOR GENERAL

SECURITY OF PERSONALLY IDENTIFIABLE INFORMATION IN
THE MEDICAID FAMILY PLANNING WAIVER PROGRAM

Report # R-1415DOH-013 • December 19, 2014

Purpose of this project:

Based upon a concern identified by one of the Department of Health's (DOH) county health department (CHD) Directors, we wanted to develop an understanding of the prevalence of personally identifiable information (PII) associated with the Medicaid Family Planning Waiver Program (Waiver Program) and evaluate whether adequate controls have been implemented to protect all documents containing applicants' PII.

What we reviewed:

We reviewed documents used by personnel at CHDs and Central Office to process applicants' eligibility determination of and enrollment into the Waiver Program. We visited the DOH in Broward, Gadsden, and Orange counties to interview personnel associated with the Waiver Program and observe security of PII. Our review strictly focused on PII in the Waiver Program and did not include a review of the eligibility determination process. (NOTE: This was only a sample of three CHDs due to time and budget constraints. All CHDs maintain documentation related to the Waiver Program and our review may not be totally reflective of how PII is maintained at all CHDs.)

ISSUES AND RECOMMENDATIONS

Our review did not identify any control weaknesses over the physical security of Waiver Program documents at Central Office and the three CHDs we visited. However, the following issue reflects an area of operation that should be addressed by Central Office management related to the Waiver Program.

1. *The amount of Personally Identifiable Information collected and maintained by the Waiver Program could be reduced.*

- The Agency for Health Care Administration (AHCA) sends a *Notification Letter* and *Application* to **women, ages 14-55 who have lost full Medicaid coverage in the last 24 months**, that they may be eligible under the Waiver Program for Medicaid coverage for family planning services.
- **Applicants are directed to apply through their CHD**, where eligibility is verified and applications are further processed.
- **The *Application* collects PII of the applicant. The *Application* also requests the SSN of anyone else in the applicant's household.** This can include the parent(s) of the applicant if the applicant is under age 21 and lives with the parent(s).
- **CHD personnel complete three forms that include PII to further process an eligible *Application*.** Two of these forms are sent by CHD personnel to Florida Medicaid's fiscal agent, HP Enterprise Services, LLC (HP).
- **DOH must maintain PII data (including SSNs) on these various paper documents for a period of six years** according to DOHP 330-1-14, *Eligibility Determination for Medicaid Family Planning Waiver Program*.
- During our review, **discussions were held with Waiver Program management and representatives of HP regarding the need to collect full SSNs and other PII on documents used to enroll applicants in the Waiver Program.** Collection of unnecessary PII puts DOH at risk if controls to secure the data are not sound.
- While the results of our review at the limited number of facilities maintaining PII data on paper documents revealed good controls over the physical security of Waiver Program documents, **reducing, and in some cases eliminating the need to collect certain unnecessary PII helps reduce the risk of a data breach in the future.**
- Following Waiver Program management's discussion with representatives of HP, **HP met with AHCA personnel about the possibility of eliminating the need to collect full SSNs and other PII in order to enroll applicants in the Waiver Program.**

- At the conclusion of our review, Waiver Program management were informed that **HP representatives and AHCA personnel agreed to reduce the requirement of collecting full SSNs to only the last four digits of the applicant's SSN. AHCA personnel also agreed to no longer require the *Batch Transmittal* form be submitted by CHDs to HP.**
- **Waiver Program management has already begun to make the necessary changes to its forms and policy. We will monitor the progress of such changes through completion.**

WE RECOMMENDED Waiver Program management continue to implement agreed upon changes to Waiver Program forms related to collection of PII during the enrollment process. This also includes updates to applicable policy and dissemination to and training of CHD personnel once the elimination and redesign of the applicable forms and update to policy is complete.

SUPPLEMENTAL INFORMATION

Section 20.055, *Florida Statutes*, charges the Department's Office of Inspector General with responsibility to provide a central point for coordination of activities that promote accountability, integrity and efficiency in government.

The review was conducted by Mark H. Boehmer, CPA, Senior Management Analyst II, under the supervision of Michael J. Bennett, CIA, Director of Auditing.

Our methodology included interviews with management and staff at Central Office, as well as at selected counties. We reviewed applicable laws, rules, policies and procedures.

This project was not an audit, as industry-established auditing standards were not applied. Internal Audit Unit procedures for the performance of reviews were followed and used during this project.

We want to thank management and staff in the Department's Bureau of Family Health Services, School, Adolescent & Reproductive Health Section, and staff from the CHDs we visited for the information they provided and for their cooperation throughout our review.

CONTACT INFORMATION

Copies of final reports may be found on our website at:
<http://www.floridahealth.gov/public-health-in-your-life/administrative-functions/inspector-general/internal-audit.html>

Questions or comments related to the information provided in this report should be addressed to the
Director of Auditing, Florida Department of Health by the following means:

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APPENDIX A: MANAGEMENT RESPONSE

	Recommendation	Management Response
1	<p>Waiver Program management should continue to implement agreed upon changes to Waiver Program forms related to collection of PII during the enrollment process. This also includes updates to applicable policy and dissemination to and training of CHD personnel once the elimination and redesign of the applicable forms and update to policy is complete.</p>	<p>We concur.</p> <p>The Family Planning Program Office has collaborated with the Agency for Health Care Administration (AHCA) and HP Enterprise Services, LLC (HP) to reduce and/or eliminate PII from the following Medicaid Family Planning Waiver forms: <i>Tracking Log, Input Document, and Batch Transmittal Form</i>. The Family Planning Program Office will continue to host discussions with AHCA and HP regarding reducing the PII on the <i>Medicaid Family Planning Waiver Application</i>. The Family Planning Waiver Policy, DOHP 330-1-14, will be updated to reflect the redesign of the applicable forms by December 19, 2014. The Family Planning Program Office will disseminate the updated policy and forms to DOH in the counties in January 2015. A training to review the enrollment process in detail is also tentatively scheduled for January 2015.</p> <p><i>Contact:</i> Sharmila Maragh, MSN, RN, APHN-BC, Family Planning Program Administrator</p> <p><i>Anticipated Completion Date:</i> February 13, 2015</p>