



RON DESANTIS  
GOVERNOR

MARY C. MAYHEW  
SECRETARY

March 13, 2020

Mary C. Mayhew, Secretary  
Agency for Health Care Administration  
2727 Mahan Drive  
Tallahassee, Florida 32308

Dear Secretary Mayhew:

In accordance with Internal Auditing Standards, attached is a final status update from the Division of Operations, Bureau of Human Resources in response to our audit report number *AHCA-1617-02-A, Employee Background Screening Process*, published on April 5, 2018.

Management has indicated corrective action has been completed for all of our report issues. A detailed description of all issues, recommendations, and management's responses can be found in the attached table.

If you have any questions regarding this report, please let me know.

Sincerely,

Mary Beth Sheffield  
Inspector General

MBS/ag

Attachment

cc: Toby Philpot, Chief of Staff  
Katie Strickland, Communications Director  
James Miller, Chief Strategic Officer  
Jamie Skipper, Bureau Chief, Human Resources



**Agency for Health Care Administration**  
**Office of Inspector General – Internal Audit**  
**Report Title: Employee Background Screening Process**  
**Report #: AHCA-1617-02-A, issued April 5, 2018**  
**Final Status as of March 13, 2020**

| No. | Finding(s)   | Recommendation(s)  | Previous Management Response(s)   | Status Update, Anticipated Completion Date and Contact |
|-----|--|--|---|--|
| 1   | The Agency hires employees prior to the completion of level 2 background screening, increasing exposure to security, legal, reputational, and financial risks. | <p>We recommend the following:</p> <ol style="list-style-type: none"> <li>Prospective hires should complete level 2 background screening before being hired and granted access to facilities, information systems, and confidential data. Implementation of this recommendation should eliminate the issues related to monitoring fingerprint registration delays for new hires addressed in Finding 2.</li> </ol> | <p><u>Status as of October 4, 2019</u><br/> Completed on August 26, 2019. The Background Screening Unit phased in the last group (Division of Medicaid) to the Pilot pre-hire process. All hiring actions started after August 26<sup>th</sup> will be completed under the pre-hire process.</p> <p>The Background Information Verification Form has also been completed for all users, and was sent to all pre-hire groups on August 23, 2019, including the Division of Medicaid. Also provided was instructions for the pre-hire process for all areas.</p> <p><u>Status as of April 4, 2019</u><br/> Partially Completed. The Background Screening (BGS) Unit is still working on implementing a level 2 background screening process prior to prospective hires being hired. On January 29, 2019, the BGS Unit began piloting this process within the General Counsel’s Office and the Division of Information Technology.</p> | <p style="text-align: center;"><b>Completed</b></p>    |

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|-----|------------|-------------------|--|--|
|     |            |                   | <p><i>Anticipated Completion Date: We anticipate having the entire agency moved to a pre-hire background check process no later than July 31, 2019.</i></p> <p><i>In addition, once the Electronic PAR process begins, it will be easier for the BSG Unit to initiate the pre-hire screening at the beginning of the hiring process for supervisors.</i><br/> <i>Marlena McAllister</i></p> <p><u>Status as of October 8, 2018</u><br/>           To ensure that background screenings are performed prior to the employee's hiring and gaining access to agency records and equipment, an electronic request to hire system will be created. In early September 2018, an initial workgroup consisting of staff from the Bureau of Human Resources and Bureau of Application Development and Support, Division of Internet Technology, met to discuss the specifications of this project to create the New Hire PAR Routing Solution in the Customer Relations Management (CRM). This new electronic system will track and create workflow approvals for new hire packages which are currently routed manually. The system will also notify the BGS Unit when the new hire package is submitted by the personnel liaison. This will begin the process to perform the background screening. The hiring package will continue to route through</p> |  |

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|     |            |                   | <p>the approval steps in the new electronic system while the BGS Unit processes the fingerprinting results. The package will stop at the Recruitment and Classification Unit until the BGS Unit approves the background screening.</p> <p><i>Anticipated Completion Date: Expected timeline to complete this electronic system cannot be determined at this time until the developers have completed the design of the new system.</i><br/> <i>Marlena McAllister</i></p> <p><u>Status as of April 5, 2018</u><br/>           We are in agreement with the recommendation to require prospective hires to complete level 2 background screening before being hired and gaining access to facilities, information systems, and confidential data. The BGS Unit in the Bureau of Human Resources will develop an implementation plan outlining action items needed for a smooth transition.</p> <p><i>Anticipated Completion Date: Completion date is unknown at this time and will be dependent upon the completion of the implementation plan.</i></p> |  |

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|     |            | 2. Amend the Background Screening Policy to add this requirement. | <p> <u>Status as of October 4, 2019</u><br/>           Partially Completed. The Background Screening Policy is currently being updated. A draft version of the new policy and manual has been generated and is being amended based on feedback received during the piloting phase.         </p> <p>           The Background Information Verification Form has been modified and the Application for Exemption Form will be incorporated into the approved policy.         </p> <p> <i>Anticipated Completion Date: October 31, 2019</i><br/> <i>Jamie Skipper</i> </p> <p> <u>Status as of April 4, 2019</u><br/>           Partially Completed. The Background Screening Policy is currently being updated. While a draft version of the new policy and manual has been generated, it is still being amended based on feedback that is being received during the piloting phase.         </p> <p> <i>Anticipated Completion Date: We anticipate a draft will be provided to management for review and approval by April 30, 2019. Once approved, the BGS Unit will update the OIG's office and the Agency Portal webpage.</i><br/> <i>Marlena McAllister</i> </p> | <p style="text-align: center;"><b>Completed</b></p> <p>           The Background Screening Policy was initially approved by management on February 26, 2020; however, minor changes were requested after initial review and approval had been received by the General Counsel's Office and HIPAA Office. Therefore, the forms required a second review and approval by the General Counsel's Office and HIPAA Office prior to policy completion. The Background Screening Policy is complete and signed effective March 6, 2020.         </p> |

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|     |            |                   | <p><u>Status as of October 8, 2018</u><br/>           The BGS Unit has updated all the Desktop Reference Manual including relevant procedures, forms, and memos as part of the preparation to transition into the new pre-hire background screening process. The updates will serve as the basis to amend the Background Screening Policy which will be amended by November 30, 2018.</p> <p><i>Anticipated Completion Date: November 30, 2018</i><br/> <i>Marlena McAllister</i></p> <p><u>Status as of April 5, 2018</u><br/>           We are in agreement with the recommendation to require prospective hires to complete level 2 background screening before being hired and gaining access to facilities, information systems, and confidential data. The BGS Unit in the Bureau of Human Resources will develop an implementation plan outlining action items needed for a smooth transition.</p> <p><i>Anticipated Completion Date: Completion date is unknown at this time and will be dependent upon the completion of the implementation plan.</i></p> |  |

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| 2   | Monitoring efforts need improvement to ensure timely follow-up and proper documentation of fingerprinting completion. | We recommend the following:<br>1. Increase monitoring efforts including implementing a quality review process to help ensure timely and proper documentation of background screenings. | <p><u>Status as of October 8, 2018</u><br/>Completed</p> <p>In July 2018, the Background Screening database was completed. The BGS Unit began running reports on a weekly basis from the Background Screening database for a list of potential new hires that were not fingerprinted. The database is also queried on a monthly basis for a list of the five-year rescreens that were not fingerprinted. Staff review these reports and send notification emails to affected offices. Follow up emails are sent to the offices if the fingerprints are not completed within five business days.</p> <p><u>Status as of April 5, 2018</u><br/>We agree with the recommendations above. The BGS Unit within the Bureau of Human Resources will develop and implement a quality review process that will address the timely and proper documentation of background screenings.</p> <p><i>Anticipated Completion Date: Completion date is unknown at this time and will be dependent upon the completion of the implementation plan.</i></p> | <p style="text-align: center;"><b>Completed</b></p>    |

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|     |            | 2. Continue to implement proactive supervisor notification for retention hits as standard practice, and amend Procedures for Background Screening to reflect proactive notification accordingly. | <p> <u>Status as of October 8, 2018</u><br/>           Completed<br/><br/>           The BGS Unit accelerates issues of nonresponsive employees to the appropriate managers. As indicated in the above response, a follow up email is sent if no action is taken after five business days. The BGS Manager notifies the nonresponsive employee by email and phone call to request a registration date for fingerprinting. If the employee does not provide a fingerprinting date within two business days of being notified, the issue accelerates to the Human Resource Director and/or Deputy Secretary of Operations. Since our last response, the BGS manager was only involved in one follow-up event. No other issues have occurred that involved the Human Resource Director or Deputy Secretary of Operations.         </p> <p> <u>Status as of April 5, 2018</u><br/>           The BGS Unit will accelerate issues involving employees who are not responding to notifications for fingerprinting in a timely manner to the applicable Division Director and the Agency Head.         </p> <p> <i>Anticipated Completion Date: Completion date is unknown at this time and will be dependent upon the completion of the implementation plan.</i> </p> | <p style="text-align: center;"><b>Completed</b></p>    |



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|-----|------------|---|---|--|
|     |            | 3. Periodically remind Agency employees of the two-day arrest/conviction notice requirement in the HR newsletters and the annual Keep Informed employee training. | <p><u>Status as of October 8, 2018</u><br/>           Partially Completed. In February and October 2018, a reminder for the two-day arrest/conviction notice was placed in the Human Resource Newsletter. The same information will be included in the Supervisor Training for Background Screening in late October and in the HR Liaison Training in December 2018.</p> <p><i>Anticipated Completion Date: December 12, 2018<br/>           Marlana McAllister</i></p> <p><u>Status as of April 5, 2018</u><br/>           The BGS Unit will include an article once a year in the Human Resource Newsletter regarding the two-day arrest/conviction notice requirement as a reminder. The annual Keep Informed training will also be updated to include a statement about this requirement.</p> <p>The BGS Unit will develop an implementation plan outlining action items needed for a smooth transition, which will include the development of a pre-hire letter and the necessary changes to the interview process.</p> <p><i>Anticipated Completion Date: Completion date is unknown at this time and will be dependent upon the completion of the implementation plan.</i></p> | <p><b>Completed</b></p>                                |