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**MICHAEL POST, C.P.A., M.B.A.**  
**HARRIS COUNTY AUDITOR**

September 17, 2021

Dear Ms. Robinson:

The Harris County Auditor's Office Audit Division has completed an audit of the Harris County Public Health Service's (PHS) Refugee Medical Screening (RMS) Grant program. The results of our audit are included in the attached report.

We appreciate the time and attention provided by you and your staff during this engagement. Please anticipate an email request to complete the Audit Division's Post Engagement Survey. We look forward to your feedback. If you have any questions, please contact me or Errika Perkins, Chief Assistant County Auditor, 713-274-5673.

Sincerely,

A handwritten signature in blue ink that reads "Michael Post". The signature is written in a cursive style with a long horizontal stroke at the end.

Michael Post  
County Auditor

Report Copies:

District Judges  
County Judge Lina Hidalgo  
Commissioners:  
    R. Jack Cagle  
    Rodney Ellis  
    Adrian Garcia  
    Tom Ramsey  
Christian Menefee  
Dave Berry  
Gwen Sims

AUDIT REPORT  
**REFUGEE MEDICAL SCREENING GRANT AUDIT**  
SEPTEMBER 17, 2021

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## Executive Summary

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### OVERALL CONCLUSION

The overall controls related to the RMS Grant program were found to be effective. However, opportunities for improvement were identified surrounding user access controls governing the patient medical record system (EPIC). The issue was discussed with PHS Management, and a management action plan has been developed, which will address the issue identified by September 24, 2021.

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### SCOPE AND OBJECTIVE

The scope of the audit was for the 12 months ending February 28, 2021. The objective was to evaluate the effectiveness of compliance in the following areas for the RMS Grant program:

- Activities allowed or unallowed
- Allowable costs
- Eligibility
- Reporting
- Medication and vaccine management

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### SUMMARY OF AUDIT ISSUE

- Terminated EPIC user accounts were not deactivated timely.

The audit issue, management's action plan to address the issue, and background information regarding this audit are discussed in more detail on the following pages. The audit issue is ranked based on the likelihood and impact of the risk to Harris County.

## AUDIT ISSUE

### **ISSUE #1: Terminated EPIC User Accounts Were Not Deactivated Timely**

**[High]**

**What is the Issue:** Two employees' user accounts were not deactivated until 46 days and 61 days after the employees' terminations, see **Appendix A**. The accounts were not accessed after the employees' date of separation and management has since disabled these accounts to prevent unauthorized access.

**Why it Happened:** PHS has not formally documented a procedure to remove EPIC user access at the time of employee termination, resulting in processing delays from RMS staff, PHS Human Resources (HR), and IT, as depicted in **Appendix A**. Additionally, RMS Management, PHS HR, and IT departments were not aware that County policy requires user access accounts to be disabled within 24 hours of termination.

**Why it Matters:** If a terminated employee's account is not deactivated timely, it could be utilized to log into EPIC and access patients' confidential information. This is vital since the EPIC system allows access to patient information without a Harris County network login.

**What is Expected:** Section C.1.9 of the Harris County Information Security Access Control Policy states that "all user access privileges to Harris County systems and applications must be disabled immediately or, in any event, no later than 24 hours after an employee or non-employee termination."

**What Action(s) are Suggested:** PHS Management should ensure that PHS has a procedure to remove EPIC user access when an employee resigns or is terminated to ensure that the separated employee's system access is disabled within in 24 hours. PHS Management should consider modifying their termination checklist to include procedures for removing all system access.

### **MANAGEMENT'S ACTION PLAN**

#### **Responsible Parties:**

- A) Michael Ha, Disease Control and Clinical Prevention (DCCP) Division Director
- B) Whitney Hampton, Refugee Health Services (RHS) Program Director
- C) Gopi Wadhwa, Project Business and Technology (PBT) Director/Administrator
- D) Ed Anderson, HR Director

- 1) To address the delays in the near term, program leadership and staff will be trained on the offboarding process by responsible party B) above. This offboarding process is to include timely entry into the CRM system any staff resignations or terminations, as well as prompt communication with the PHS System Administrator via email and Microsoft Teams chat to notify the Administrator of the termination.
- 2) To address the delays in the long term, responsible party C) above will amend the Status Change component of the CRM system to add a checkbox asking if the terminating staff has EPIC access. The selection of this checkbox will create a high-priority ticket to alert the PHS System Administrator of the termination and prompt the process for access removal by Harris Health, the 'owner' of PHS EPIC access. After this CRM system update, the prompt communication by the program with the PHS System Administrator via email and Microsoft Teams chat will remain as part of the emergent offboarding process. PHS Internal IT/PBT has also made changes with timely account deactivation processes that are not connected to EPIC access deactivation.

- 3) Responsible party A) above will circle back with responsible parties B) and C) above by the due dates below to confirm the completion of these action items.
- 4) PHS HR Director (Responsible Party D) will ensure that a PHS-modified version of Auditors Office Form #3412 (Employee Termination Summary) is implemented, including reminding managers/supervisors of the importance of immediate notification of staff offboarding once they are made aware.

**Due Date:**

- 1) Training of the RHS program team to be completed immediately.
- 2) The update to the CRM system will be completed by September 15, 2021. Then, backup process will be utilized for emergent offboarding process to ensure PHS account deactivation is initiated in a timely manner.
- 3) Implementation of the PHS-modified version of Auditors Office Form #3412 and management notification will be completed by September 24, 2021.

## BACKGROUND

The U.S. Committee for Refugees and Immigrants (USCRI) administers the RMS Grant, which is funded by the U.S. Department of Health and Human Services Office of Refugee Resettlement (ORR). PHS contracts with USCRI to administer the RMS Grant program in Harris County. Program services include health screening, assessment, referral services, and follow-up. The contract between USCRI and PHS is renewed yearly at USCRI's sole discretion.

## ACCOUNTABILITY

We conducted our audit in accordance with the International Standards for the Professional Practice of Internal Auditing ("Standards"). The Standards require that we comply with the code of ethics and obtain reasonable assurance that significant risks to the activity are minimized to an acceptable level.

The engagement's scope did not include a detailed inspection of all transactions. There is a risk that fraud or errors were not detected during this engagement. Therefore, the official retains the responsibility for the accuracy and completeness of their financial records and for ensuring sufficient controls are in place to detect and prevent fraud, errors, or omissions.

## APPENDIX A

The table below depicts the timeline of removing 2 EPIC users' access among the parties involved.

Employee	Termination date	RMS Staff submitted request to PHS HR	PHS HR received request from RMS	PHS HR submits CRM Notification	PHS IT received notification email from PHS HR	EPIC deactivation date	Total number of days
1	10/30/2020	11/5/2020	11/5/2020	11/11/2020	11/11/2020	12/15/2020	46
2	1/2/2021	1/12/2021	1/12/2021	1/28/2021	1/28/2021	3/4/2021	61