



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

ORLENE HAWKS
DIRECTOR

November 29, 2021

Richard Lowe, Chief Internal Auditor
Office of Internal Audit Services
Michigan State Budget Office
George W. Romney Building
111 South Capitol, 6th Floor
Lansing, Michigan 48913

Dear Mr. Lowe:

In accordance with the State of Michigan, Financial Management Guide, Part VII, I submit to you LARA's summary of responses addressing the recommendations contained within the Office of the Auditor General's performance audit report (# 641-0220-20) of LARA's Michigan Automated Prescription System.

Please direct any questions you may have regarding this summary to me at (517) 241-0777.

Sincerely,

Justin Teel
Audit Liaison

cc: JoAnne Huls, Chief of Staff, Executive Office
Maria Martinez, Chief Compliance Officer, Executive Office
Trish Foster, Chief Operating Officer, Executive Office
Doug Ringler, Office of the Auditor General
Mary Ann Cleary, House Fiscal Agency
Kathryn Summers, Senate Fiscal Agency
Representative Thomas Albert, House Appropriations Committee
Representative Jeff Yaroch, House Appropriations Subcommittee
Representative Steven Johnson, House Oversight Committee
Senator Jim Stamas, Senate Appropriations Committee
Senator Aric Nesbitt, Senate Appropriations Subcommittee
Senator Edward McBroom, Senate Oversight Committee
Orlene Hawks, Director, LARA
Marlon Brown, Chief Administrative Officer, LARA
Courtney Pendleton, Deputy Director, LARA
Dan Horn, Director, Finance and Administrative Services, LARA
Debra Gagliardi, Director, Bureau of Professional Licensing, LARA

Bureau of Professional Licensing (BPL)
Department of Licensing and Regulatory Affairs (LARA)
Summary of Agency Responses to Recommendations
Report Number 641-0220-20
November 2021

1. Audit recommendations the agency agrees with and has complied with:
1,2,3,4
2. Audit recommendations the agency agrees with and will comply:
None
3. Audit recommendations the agency disagrees with:
None

Finding 1: We recommend that LARA analyze the utilization of MAPS patient history reports for all prescribers and initiate follow-up or disciplinary action as appropriate.

Agency Response:

LARA agreed with the finding and took steps to initiate reviews of prescribers who fail to comply with the MAPS use requirement.

LARA has a policy and procedure in place to (1) actively determine non-compliance with the MAPS use requirement, (2) issue prescribers a warning letter for initial non-compliance and (3) initiate further warnings or disciplinary action, as appropriate, upon further non-compliance of the MAPS use requirement.

LARA complied with the recommendation of this finding, and Douglas Padgett, Manager of MAPS, is the responsible individual for this activity.

Finding 2: We recommend that LARA improve its MAPS user access recertification controls.

Agency Response:

LARA agreed and has taken active measures to improve in this area.

LARA now has measures in place that have effectively ensured that MAPS users have proper credentials for access to the system, including a monthly manual match of active MAPS users to the professional licensing database (MiPLUS). In addition, LARA has

implemented a yearly reverification process for all non-health professional users and delegates and worked with the MAPS vendor to implement an automated reverification process of MAPS users, which went live on October 13, 2021.

LARA complied with the recommendation of this finding, and Douglas Padgett, Manager of MAPS, is the responsible individual for this activity.

Finding 3: We recommend that LARA ensure that it properly evaluate the operating effectiveness of its TPSO's controls.

Agency Response:

LARA agreed and has taken active measures to improve this process.

LARA acknowledges the requirement to consider Bamboo Health (formerly Apriss) as a TPSO and has now done so. LARA has implemented a process to annually receive and review Bamboo Health's SOC2 report to assess systems relevant to security, availability, processing integrity, and confidentiality.

LARA complied with the recommendation of this finding, and Tony Weber, Director of the Security, Privacy, and Compliance Division is responsible for this activity.

Finding 4: We recommend that LARA monitor MAPS administrator user activity.

Agency Response:

LARA agreed with the finding to improve the monitoring of administrative users and put in place an effective procedure to semi-annually audit MAPS administrator user activity by verifying that all MAPS activity performed by a MAPS administrator is done so for justifiable reasons consistent with the MAPS statute.

The new audit procedure, combined with the capability to access system audit records beyond one year after the date of creation, brings MAPS into compliance with State of Michigan Technical Standard 1340.00.040.01.

LARA complied with the recommendation of this finding, and Douglas Padgett, Manager of MAPS, is the responsible individual for this activity.