



STATE OF MICHIGAN
DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

GRETCHEN WHITMER
GOVERNOR

ELIZABETH HERTEL
DIRECTOR

December 22, 2022

Rick Lowe, Chief Internal Auditor
Office of Internal Audit Services
111 South Capitol Avenue
8th Floor, Romney Building
Lansing, Michigan 48933

Dear Mr. Lowe:

In accordance with the State of Michigan, Financial Management Guide, Part VII, attached are the summary table identifying our responses and corrective action plans to address recommendations contained within the Office of the Auditor General's Performance Audit of 2021 OAG Michigan State Disbursement Unit, Office of Child Support.

Questions regarding the summary table or corrective action plans should be directed to me at 517-241-4237 or MyersP3@michigan.gov.

Sincerely,

Pam Myers

Pam Myers, Director
Bureau of Audit

PM:wb

Enclosure (1)

c: Office of the Auditor General
House Fiscal Agency
Senate Fiscal Agency
Executive Office
DHHS, David Knezek
DHHS, Farah Hanley

House Appropriations Committee
House Standing Committee
Senate Appropriations Committee
Senate Standing Committee
DHHS, Amy Epkey
DHHS, Erin Frisch

PERFORMANCE AUDIT OF 2021 OAG
MICHIGAN STATE DISBURSEMENT UNIT,
OFFICE OF CHILD SUPPORT

DEPARTMENT OF HEALTH AND HUMAN
SERVICES

AUDIT RESPONSE

Approved: Amy Epkey

Amy Epkey, Senior Deputy Director
Department of Health and Human Services

Date: December 20, 2022



AUDIT REPORT SUMMARY

DEPARTMENT: Bureau of Child Support

AUDIT PERIOD: June 1, 2018 through May 31, 2021

REPORT DATED: September 21, 2022

DISPOSITION OF AUDIT RECOMMENDATIONS

CITATIONS COMPLIED WITH	CITATIONS TO BE COMPLIED WITH	CITATIONS DHHS DID NOT AGREE WITH
Finding 1 (9/9/2022)		

Audit Response
Performance Audit
2021 OAG Michigan State Disbursement Unit, Office
of Child Support
Department of Health and Human Services
June 1, 2018 through May 31, 2021

Recommendation 1: Improved monitoring of child support information system user access needed

We recommend the OCS enhance its monitoring of child support information system user access controls for MiSDU vendor staff.

Response

The oversight for maintaining confidentiality agreements and compliance with access control standards occurred during and soon after a complex transition to a new MiSDU vendor pursuant to a competitive rebid of the contract. The complexity of transition activities was exacerbated due to global COVID-19 pandemic related restrictions in place during the time. Assigning conflicting roles temporarily is essential for critical and time-sensitive tasks. The vendor monitored user activity daily, however, the monitoring activities were not documented. Privileged user access is now reviewed upon initial access request and quarterly thereafter for appropriateness. Pursuant to the successful transition and implementation of all services to the new vendor, procedures and practices have been strengthened to maintain compliance and document monitoring activity.

- A. The vendor has implemented a process that ensures confidentiality forms are included as part of the onboarding process for all new hires.
- B. MDHHS has implemented periodic reviews of vendor documentation of evidence of monitoring of conflicting roles and reviews of user accounts with privileged access.

- Assigning conflicting roles temporarily is essential for critical and time-sensitive tasks. The vendor did have in place daily monitoring of activities of the users. The vendor, however, did not document the completion of these activities.

- Pursuant to implementation and stabilization of transition activities the vendor has implemented additional steps and reviews to ensure that privileged users access, when requested, is appropriate and authorized. Additionally, the vendor has implemented periodic review procedures for ensuring principle of least privilege.