PRESCRIPTION DRUG REGISTRY AUDIT:
WHAT DO YOU DO WHEN THEY WON'T GIVE YOU THE DATA?

2019 NSAA IT Conference – Grand Rapids, MI
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Montana Legislative Audit Division
OBJECTIVES

• Talk about your authority to get information
• What do you do when this happens?
• Why did this happen & how are we going to prevent it?
IN MONTANA

“The Legislature shall establish a legislative post-audit committee which shall supervise post-auditing duties provided by law.”

“The legislative auditor may examine at any time the books, accounts, activities, and records, confidential or otherwise, of a state agency.”

IT Audit: Small But Mighty

IT at the Agencies:
Decentralized
State IT Division:
Service & Governance

IT in this specific audit
Administratively attached board
Vendor managed system
“The legislative auditor may examine at any time the books, accounts, activities, and records, confidential or otherwise, of a state agency.”

Audit Timeline in a nutshell…

- **Confidentiality**
  - Vendor & User security measures

- **Integrity**
  - Is it possible to identify misuse and diversion?

- **Vendor/Project Management**
  - Failing to receive grant money and completely replacing the system
WHAT’S YOUR AUTHORITY?

- Discuss at your table what your authority is
  - What challenges do you have?
  - Have you experienced timelines like this?
  - Do you have penalties established?
WHAT DO YOU DO?

1) GET THE DATA
2) How does this change things?
3) Document it

If you know yourself and your enemy...
You can win

BE PERSISTANT

Meetings
Legal counsel
Memo of understandings
More meetings

• Is anything reliable?
• Extra work?
• Other sources?
WHAT WE DID...

Agency Motive
Why are they doing this?

Realistic
- Already 6 months behind
- Motive to slow vs. hide
- Already looking at reliability

Likely
- 4 million records
- 1 FTE – no time
- Vendor = $$ and time

Partial Data?
- Objective to verify what the data can do
  not find ALL

Run with it...
**DATA RELIABILITY**

- Patient ID
- Birth Dates
- Prescription Dates

**Date analysis**
- New column with pass/fail based on the days between dates

**Duplicate Patient ID**
- Almost 700K patient IDs – **NOPE**

**ACL Sample**
- 9200 IDs

**Near Duplicates Script**
- 738 IDs

**Individual Review**
- 215 Duplicates

**Results:**
- Recommend more error reporting for pharmacies that enter nonsensical data
- Move forward with analysis
- Patient ID is reliable enough, but won’t catch everything
MISUSE & DIVERSION

- Pharmacy Activity
- Patient Activity
- Prescriber Activity

Results:

- Lots of indication, not enough information
- Recommendation to start requiring the information
- **BOTTOM LINE:** Data is almost there and almost useful. Start using it.
Delays of this nature impact our ability to effectively develop audit scope and methodologies, increases risks of data being changed or altered, and results in untimely completion of our audit work. The delay we experienced during the audit resulted in reporting our findings after the 2019 Legislative Session. If we had received the information in a timely manner, our audit report would have been ready for 2019 Legislative Session.

We also experienced constraints to our audit approach and analysis due to limited reliability of MPDR data. This included missing data, nonsensical data, and inconsistencies in data reporting.
POST MORTEM REVIEW

- What happened?
- Why?
- How do we prevent this?

What would you have done?
GETTING DATA GOING FORWARD…

- Start Early
- What do you need?
- Talk about it
- MAKE THEM A PARTNER

Data Analysis Process and Plan
- Important considerations
STEP 1

- Define Your Questions and Set Clear Measurement Priorities

What is my objective?

<table>
<thead>
<tr>
<th>What is my objective?</th>
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</thead>
<tbody>
<tr>
<td>What questions do I need to answer?</td>
</tr>
<tr>
<td>What exact data is needed?</td>
</tr>
<tr>
<td>How to measure/use the data? (meaning can differ based on objective)</td>
</tr>
</tbody>
</table>

Additional Considerations

- Data Definition: Who owns data? timeframes? What exists?
- Security/Transfer: What are the security requirements needed?
- Structure: Where does the data come from?

WHY you need this data
STEP 2

- Determine Data Appropriateness (Reliability and Validity)

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are controls in place to assure the reliability and validity of the data?</td>
<td>Do the controls over <strong>data processing</strong> increase the assurance that the data is complete?</td>
</tr>
<tr>
<td></td>
<td>Do the edit check controls increase the assurance that the data set is <strong>accurate, consistent, and reliable</strong>?</td>
</tr>
<tr>
<td></td>
<td>Do detective controls, management <strong>override rights</strong>, and personnel <strong>competency</strong> impact the validity of the data by <strong>changing what the data is meant to represent</strong>?</td>
</tr>
<tr>
<td></td>
<td>Do <strong>access controls</strong> increase the assurance that the data set is accurate and has integrity?</td>
</tr>
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**Determine HOW you need to analyze**
STEP 3

• Determine Sufficiency of Data

How much does the audit depend on the data?

Is corroborating evidence necessary based on audit risk?

What quantity of data is necessary to review?

WHAT ELSE do you need to analyze
STEP 4

• Final Decision

<table>
<thead>
<tr>
<th>Determination</th>
<th>What?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sufficiently Reliable</td>
<td>We are comfortable using the data because it’s good or the errors are minimal. Using the data will not lead to an incorrect message.</td>
</tr>
<tr>
<td>Not Sufficiently Reliable</td>
<td>The data is incomplete or has significant errors. It’s likely an incorrect message could result</td>
</tr>
<tr>
<td>Undetermined Reliability</td>
<td>Nobody knows enough about the data, more questions are raised, we’re going to need a bigger budget. We don’t know and can’t figure out enough to be comfortable right now.</td>
</tr>
</tbody>
</table>

What’s next…
- More work in fieldwork or not
- Limitations need to be documented
- We found a finding
Data Reliability Assessment:
Statement of Reliability

Known reliability issues include:

<table>
<thead>
<tr>
<th>Reliability Issue</th>
<th>Impact to this test</th>
<th>Significance (is this enough to conclude the results are unreliable?)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Data is submitted from pharmacies and not checked/verified by the board of pharmacy before it enters the registry.</td>
<td>This would impact the main results table</td>
<td>This is an assumed risk due to there not being a way to verify this data with current resources.</td>
</tr>
</tbody>
</table>
CONCLUSION

• Questions?
• Other state examples?
• Comments?
AUDIT LINKS

Montana LAD MPDR Audit