
CITY OF SAN ANTONIO
OFFICE OF THE CITY AUDITOR



Audit of San Antonio Metropolitan Health District

Immunization Division

Project No. AU19-015

January 6, 2020

Kevin W. Barthold, CPA, CIA, CISA
City Auditor

Executive Summary

As part of our annual Audit Plan approved by City Council, we conducted an audit of the San Antonio Metropolitan Health District (Metro Health), specifically the Immunization Division. The audit objectives, conclusions, and recommendations follow:

Determine if processes within the Immunization Division are effective, efficient, and adequately controlled.

Processes within the Immunization Division are effective, efficient, and adequately controlled. We verified that patient information is safeguarded in compliance with Health Insurance Portability and Accountability Act (HIPAA) regulations and that immunization personnel are trained and certified to properly safeguard patient data. We determined that the Immunization Division monitors grant expenditures to ensure that funds are used in a timely manner. In addition, the Immunization Division properly collects and safeguards cash and cash equivalents in accordance with Administrative Directive (AD) 8.1. Finally, systems access and access to the Immunization Division's network drives is appropriate and commensurate with employee duties.

We make no recommendations regarding the Metro Health Immunization Division; consequently, no management responses are required. Management's acknowledgement of these results is in Appendix B on page 5.

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Background

The mission of the Metro Health Immunization Program (Immunization Division) is to prevent and control the transmission of vaccine-preventable diseases in persons of all ages, with an emphasis on individuals at highest risk for under-immunization. To fulfill this mission, Metro Health utilizes two clinics and an outreach program.

In addition to City general funding, the Immunization Division receives grant awards from the Centers for Disease Control and Prevention (CDC) and the Department of State Health Services (DSHS) as follows:

Immunization Program Funding		
Funding	Funding Period	Award Amount
Center for Disease Control (CDC)	July 01, 2019 through June 30, 2020	\$2,339,735
Department of State Health Services (DSHS)	September 01, 2018 through August 31, 2019	\$594,495
City General Fund	October 1, 2018 through September 30, 2019	\$451,330
	Grand Total	\$3,385,560

Source: FY 2019 Adopted Budget

These awards are reimbursement agreements that assist in covering the clinical costs to house and administer the state provided vaccines. Vaccinations are offered free of charge to the uninsured, underinsured, CHIP & Medicaid eligible and American or Alaskan Natives. In agreement with award acceptance, the Immunization Division follows all CDC and DSHS regulations and reporting guidelines required to meet contractual obligations. In addition, the Immunization Division promotes the DSHS Texas Immunization Registry (ImmTrac2) to all patients as a free, secure, confidential and statewide accessible resource for immunization record access.

Targeted populations are immunized through the VFC (Vaccines for Children) program and the Adult Safety Net (ASN) program. The VFC program is for individuals through 18 years of age who are Medicaid, CHIP, underinsured, uninsured, and/or American or Alaskan Natives. The ASN program is for those 19 or older with no insurance at all.

In February 2019, Metro Health replaced the clinic's electronic health records system with ezEMRx, a browser based application which is hosted and supported by a third party vendor.

Audit Scope and Methodology

The audit scope was FY 2019.

Testing criteria for this audit included Metro Health policies and procedures, City Administrative Directives, and grant agreements.

To gain an understanding of internal controls related to clinical and fiscal processes, we interviewed key Metro Health program and fiscal staff and visited both immunization clinics and an outreach event.

As part of our testing, we conducted reviews of state and federal grant reimbursement forms and supporting documentation as well as monthly Medicaid reimbursements to ensure that they were complete, accurate and recorded correctly in SAP. We also examined training records related to Health Insurance Portability and Accountability Act (HIPAA), immunization record releases and cash handling to verify that Immunization Division personnel were properly trained. In addition, we reviewed clinic immunization inventory purchases, receipts and storage to ensure compliance with Metro Health policies and procedures.

Furthermore, we reviewed user access roles in ezEMRx¹, SAIRS² and ImmTrac2³ for the principle of least privilege. Finally, we performed tests of physical access at the clinics to ensure that access is sufficiently limited to appropriate personnel.

We relied on computer-processed data in ezEMRx to test for appropriate user access, Hirsch Velocity (a system used by the City's ID Office) to verify building access, SAEPS (a system used by the City's purchasing department) to test for segregation of duties, and SAP (the City's financial system) to validate that grant expenditures were recorded correctly and to obtain a current listing of Metro Health employees to test for user access. Our reliance was based on performing direct tests on the data rather than evaluating the system's general and application controls. We do not believe that the absence of testing general and application controls had an effect on the results of our audit.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

¹ Metro Health's electronic health record

² San Antonio Immunization Repository System

³ Department of State Health Services (DSHS) Texas Immunization Registry

Audit Results and Recommendations

The Metro Health Immunization Division processes are effective, efficient, and adequately controlled.

We verified that patient information is safeguarded in compliance with HIPAA regulations and that immunization personnel are trained and certified to properly safeguard patient data. In addition, immunization records are given out only with proper documentation. We also determined that physical access to the clinics is sufficiently limited to authorized personnel.

Furthermore, we determined that the Immunization Division monitors grant expenditures to ensure that funds are used in a timely manner and that segregation of duties is adequate. We also determined that immunization fee amounts are correct and that the Fiscal Division staff perform periodic reconciliations of Medicaid reimbursements.

In addition, the Fiscal Division in coordination with the Immunization Division staff properly collects and safeguards cash and cash equivalents in accordance with Administrative Directive (AD) 8.1. All Immunization Division cashiers have attended required cash handling training. From a random sample of weekdays during FY 2019, we determined that the cashier end of day cash checklists are supported by appropriate documentation and that a supervisor signs off to validate the accuracy and completeness of deposit amounts and corresponding SAP entries.

We determined that system access to ImmTrac2, ezEMRx, San Antonio Immunization Repository System (SAIRS) and the Immunization Division's network drives is appropriate and commensurate with employee duties.

Finally, we determined that immunization drug inventory is properly tracked, secured and refrigerated if needed to ensure drug potency.

There are no findings. Consequently, we make no recommendations to Metro Health Management.

Appendix A – Staff Acknowledgement

Gabe Trevino, CISA, Audit Manager
Sheryl Wardashki, CPA, Auditor in Charge
Lawrence Garza, CFE, Auditor
Dan Kuntzelman, CIA, CISA, Auditor
Denise Trejo, Auditor

Appendix B – Management Responses



CITY OF SAN ANTONIO

SAN ANTONIO TEXAS 78203-3966

December 12, 2019

Kevin W. Barthold, CPA, CIA, CISA
City Auditor
San Antonio, Texas

RE: Management's Acknowledgement of its Review of the Audit of the Health Immunization Division

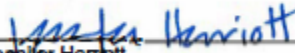
Metropolitan Health District has reviewed the audit report and provided its comments to the auditors. As there are no recommendations for management, no management responses are required.

Metropolitan Health District:

Fully Agrees

Does Not Agree (provide detailed comments)

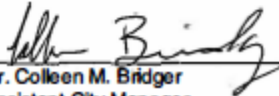
Sincerely,



Jennifer Herriott
Interim Director
Metropolitan Health District

12/17/19

Date



Dr. Colleen M. Bridger
Assistant City Manager
City Manager's Office

12-17-19

Date