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# **CITY OF SAN ANTONIO**

## **OFFICE OF THE CITY AUDITOR**



Audit of San Antonio Metropolitan Health District

Oral Health Program

Project No. AU19-016

September 19, 2019

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

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## Executive Summary

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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 Oral Health program. The audit objectives, conclusions, and recommendations follow:

### **Is the Oral Health program adequately managed and in compliance with policies, contracts, and grant requirements?**

Metro Health's Oral Health program is adequately managed and in compliance with policies, contracts, and grant requirements. We determined that the Oral Health program has adequate controls in place for monitoring program performance, reimbursement requests, and qualifications and training for clinical staff.

However, we identified areas within Oral Health's administration in need of improvement. We observed a lack of controls related to physical and user access and lack of procedures to verify professional liability insurance.

We recommend the Director of Metro Health:

- Establish key control procedures and periodic reviews of user access to ensure appropriate access to Protected Health Information (PHI).
- Ensure staff is properly trained to review professional liability insurance requirements. Also, coordinate with the Office of Risk Management to ensure that requirements are clearly communicated to contracted and temporary employees.

Metro Health Management agreed with the audit results and has developed positive action plans to address them. Management's verbatim response is in Appendix C on page 8.

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## Background

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The Oral Health Program assists children with unmet dental needs by providing services including dental evaluations, fluoride treatment, sealants, education, and financial assistance for additional dental services.

Through its Miles of Smiles program and partnerships with Head Start agencies, Oral Health sets up mobile clinics in local schools and preschool centers. The children receive evaluations, treatment, and education to reduce and prevent dental issues. In addition to providing limited clinical treatment, Oral Health staff provides information and referrals to the participants.

Case managers follow-up with parents to ensure participants with unmet urgent and emergency dental needs are connected to the appropriate providers. For children who do not qualify for the Children's Health Insurance Program or Medicaid, but meet criteria from the Federal Poverty Income guidelines, Oral Health staff assists their parents or guardians in obtaining funds for treatment through the Title V program. The University of Texas Health Science Center San Antonio then coordinates with Oral Health to provide additional dental services.

The programs and corresponding agreements are approved by City Council. Monitoring of performance is performed by the program liaisons. Additionally, the department fiscal administrator and a fiscal analyst oversee the monitoring of budgets and the invoicing of partner agencies. See appendix A for 2018 and 2019 budgets.

## Audit Scope and Methodology

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The audit scope was from September 2018 through April 2019 and also included the prior year's (i.e. 2017-2018 school year and calendar year 2018) performance goals.

To establish our test criteria, we reviewed Metro Health policies and procedures, City Ordinances, contracts, and grant agreements. To gain an understanding of internal controls related to the Oral Health program, we interviewed staff from Oral Health and Finance. We also observed Miles of Smiles and Head Start mobile clinics.

As part of our testing procedures, we verified that licenses for the dentists, hygienists, and assistants were current, professional liability insurance is maintained, training is current, and required confidentiality forms were completed.

Furthermore, we performed tests to ensure that payment requests from Oral Health to Head Start and Early Head Start partner agencies (i.e. AVANCE-San Antonio Inc., Parent/Child Inc., and the City's Department of Human Services), the Medicaid Waiver 1115 program, and the Texas Department of Human Services were adequately supported. Finally, we reviewed the user access roles established within ezEMRx, Metro Health's electronic health record system, for the principle of least privilege.

We relied on computer-processed data from SmilesMaker (Oral Health's prior dental health record system) to test data accuracy, Hirsch Velocity (a system used by the City's ID Office) to verify building access, and SAP (the City's financial system) to review payments, payment requests, and inventory balances. 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.

## Audit Results and Recommendations

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### A. Oral Health Program

Oral Health has effective procedures in place to monitor program performance, reimbursement requests, and qualifications and training for clinical staff.

Program performance is regularly monitored by program liaisons and Metro Health management. Oral Health met performance requirements for its Early Head Start, Head Start, and Title V programs for the period of September 2017 through August 2018. Participants were evaluated in the fall and spring, with some additional clinics scheduled for make-ups. Case management and coordination for more dental treatment were provided based on the urgency of the dental needs and the additional qualifications of the participants.

Additionally, for calendar year 2018, Oral Health's Miles of Smiles program met three performance goals related to increasing the percentage of participants receiving preventive services and sealants and decreasing the percentage of participants with urgent dental needs.

Oral Health also has effective procedures in place to ensure reimbursement requests are supported, reviewed, and appropriately recorded. We reviewed 11 invoices from January 2019 through March 2019 totaling \$123,384 and determined invoices had appropriate support documentation and included allowable expenses.

Furthermore, the qualifications and training of clinical staff are reviewed annually. We verified that licenses and training for clinical staff were current.

### Recommendation

None

### B. Safeguarding Protected Health Information (PHI)

Oral Health does not have adequate key control procedures and are not conducting periodic user access reviews to ensure appropriate access to PHI.

We observed that Oral Health is not maintaining a current log to track the division's keys nor to document who has possession of the keys. We also observed the key which accesses a key storage locked cabinet was not appropriately secured.

Oral Health staff are responsible for safeguarding all PHI in a locked device or container accessible only to employees with the appropriate clearance. Metro Health policies outline roles, responsibilities, and required and suggested activities to minimize the risk of unauthorized use or duplication.

Oral Health staff had inappropriate access to their network drive, the ezEMRx systems and badge access. We reviewed 24 users of the “dentalusers” network drive and determine 7 users no longer worked for Oral Health. In addition, we observed one user of the ezEMRx system that had access who no longer works for the City. Finally, one employee with badge access to the building was not an Oral Health employee.

City Departments are responsible for ensuring that appropriate access controls have been developed and documented in accordance with Administrative Directive 7.8d Access Controls.

Oral Health has not established key control procedures nor periodic reviews of user access to ensure appropriate access. A lack of key control procedures and user access controls may increase the risk of impermissible use or unintended disclosure of PHI.

### **Recommendation**

The Director of Metro Health established key control procedures and periodic reviews of user access to ensure appropriate access to PHI.

### **C. Professional Liability Insurance**

Monitoring procedures to verify professional liability insurance for contracted and temporary employees are insufficient. Although applicable clinical staff members have provided some documentation of current professional liability insurance, staff is not reviewing for appropriate insurance coverage type, coverage amounts and required documentation.

We observed that 1 of 13 contracted employees did not have the required minimum amount of coverage nor a waiver from the Office of Risk Management allowing the variance.

The Office of Risk Management provides guidance on the amount of professional liability insurance coverage, the type of documentation, and any endorsements that should be included.

A lack of adequate professional liability insurance increases the potential financial risk to the City.

## **Recommendation**

The Director of Metro Health ensure staff is properly trained to review professional liability insurance meets minimum City requirements. Also, coordinate with the Office of Risk Management to ensure that requirements are clearly communicated to contracted and temporary employees.



## Appendix A – Oral Health Program Funding

Program		FY 2018 Program Funding				FY 2019 Program Funding			
		Federal	General Fund	City Match <sup>1</sup>	FY18 Total Funding	Federal	General Fund	City Match	FY19 Total Funding
1	Miles of Smiles <sup>2</sup>	\$2,004,422	\$0	\$0	<b>\$2,004,422</b>	\$1,945,586	\$0	\$0	<b>\$1,945,586</b>
2	Title V	\$211,064	\$0	\$0	<b>\$211,064</b>	\$ 271,064	\$0	\$0	<b>\$271,064</b>
3	COSA Head Start	\$0	\$111,740	\$27,935	<b>\$139,675</b>	\$181,740	\$0	\$45,435	<b>\$227,175</b>
4	Avance Head Start	\$0	\$31,000	\$6,200	<b>\$37,200</b>	\$0	\$31,000	\$ 6,200	<b>\$37,200</b>
5	COSA Early Head Start <sup>3</sup>	\$0	\$13,000	\$0	<b>\$13,000</b>	\$0	\$13,000	\$0	<b>\$13,000</b>
6	Parent/Child Early Head Start <sup>4</sup>	\$0	\$12,000	\$0	<b>\$12,000</b>	\$0	\$12,000	\$0	<b>\$12,000</b>
7	Parent/Child Head Start	\$0	\$9,000	\$ 1,800	<b>\$10,800</b>	\$0	\$9,000	\$ 1,800	<b>\$10,800</b>
		<b>\$2,215,486</b>	<b>\$176,740</b>	<b>\$35,935</b>	<b>\$2,428,161</b>	<b>\$2,398,390</b>	<b>\$65,000</b>	<b>\$53,435</b>	<b>\$2,516,825</b>

Source: City of San Antonio FY2018 and FY2019 Approved Budget

<sup>1</sup> City Match contributions come in the form of in-kind services and no actual funds are exchanged.

<sup>2</sup> Data obtained from Oral Health's Fiscal Analyst.

<sup>3-4</sup> Each fiscal year, the City agrees to allocate up to the amount stated of City's General Fund for completing objectives and activities of on-site limited oral health evaluations.

## Appendix B – Staff Acknowledgement

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Buddy Vargas, CIA, CFE, Audit Manager  
Rebecca Moulder, CIA, CISA, Auditor in Charge  
Hedei Arias, CFE, Auditor

## Appendix C – Management Response



### CITY OF SAN ANTONIO

SAN ANTONIO TEXAS 78283-3966

September 6, 2019

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

RE: Management's Corrective Action Plan for Oral Health Program Audit


Metro Health Department has reviewed the audit report and has developed the Corrective Action Plans below corresponding to report recommendations.

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
1	<b>Safeguarding Protected Health Information</b> The Director of Metro Health established key control procedures and periodic reviews of user access to ensure appropriate access to PHI.	3-4	accept	Leticia Santos, Senior Management Analyst	September 6, 2019
	<b>Action plan:</b> The Oral Health Program has implemented a key tracking log to document keys assigned to personnel. The Senior Management Analyst will ensure the key tracker is maintained and updated. In addition the Senior Management Analyst will conduct periodic reviews of the EZMRX system and dental drives user access list provided by ITSD to ensure appropriate user access to these systems.				

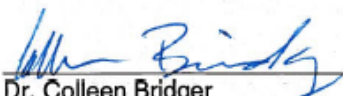
Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
2	<b>Professional Liability Insurance</b>  The Director of Metro Health ensures staff is properly trained to review professional liability insurance meets minimum City requirements. Also, coordinate with the Office of Risk Management to ensure that requirements are clearly communicated to contracted and temporary employees.	4	accept	Leticia Santos, Senior Management Analyst	August 5, 2019
<b>Action plan:</b> On August 5 <sup>th</sup> this specific finding was addressed to the Dentist and the professional liability insurance was resolved. The program has implemented a checklist to annually review and verify the professional liability insurance of each contractor and temporary employee. The checklist documents when the review was conducted and meets the minimum City standards. The program will coordinate with the Office of Risk Management to ensure city requirements are clearly communicated to Oral Health staff to ensure staff can adequately review documents and ensure requirements are clearly communicated to contracted and temporary employees.					

We are committed to addressing the recommendations in the audit report and the plan of actions presented above.

Sincerely,

  
 Jennifer Herrlott  
 Interim Metro Health Director  
 Metro Health Department

9/10/19  
 Date

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

9-10-19  
 Date