



# Department of Health

**ANDREW M. CUOMO**  
Governor

**HOWARD A. ZUCKER, M.D., J.D.**  
Commissioner

**SALLY DRESLIN, M.S., R.N.**  
Executive Deputy Commissioner

April 28, 2017

Mr. Kenrick Sifontes, Audit Director  
Office of the State Comptroller  
Division of State Government Accountability  
110 State Street – 11<sup>th</sup> Floor  
Albany, New York 12236-0001

Dear Mr. Sifontes:

Enclosed are the Department of Health's comments on the Office of the State Comptroller's Follow-Up Audit Report 2016-F-29 entitled, "NYC School-Based Health Centers: Security and Controls Over Medications and Related Supplies." (2013-S-34)

Thank you for the opportunity to comment.

Sincerely,

Sally Dreslin, M.S., R.N.  
Executive Deputy Commissioner

Enclosure

cc: Marybeth Hefner  
Brad Hutton  
Ellen Anderson  
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**Department of Health  
Comments on the  
Office of the State Comptroller's  
Follow-Up Audit Report 2016-F-29 entitled,  
New York City School-Based Health Centers: Security and Controls  
Over Medications and Related Supplies**

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We are pleased to see the Office of the State Comptroller's (OSC) Follow-Up Audit Report 2016-F-29 entitled, "New York City School-Based Health Centers: Security and Control over Medications and Related Supplies," indicated the recommendation made in the audit was implemented. The following are the Department of Health's (Department) comments in response to the issues discussed in the report.

The Department acknowledges OSC found two School-Based Health Centers (SBHCs) that were not in compliance with the *Principles and Guidelines for SBHCs* related to the appropriate inventory controls over medications and related supplies. The Department will institute the following actions:

- We have sent a letter to the Medical Director of each SBHC reiterating the requirement for developing and implementing policies related to security, inventory control, and accountability for medications and related pharmaceutical supplies (i.e. syringes and needles). All SBHC-sponsoring facilities will be required to attest to complying with the *SBHC Principles and Guidelines* on an annual basis, as well as when a facility submits an application to open a new SBHC.
- Require that each SBHC provide the Department with current policies and procedures that address security, inventory control and accountability for medications and related supplies (i.e., syringes and needles) upon an on-site visit by the Department or its agent, currently the Island Peer Review Organization (IPRO). The SBHC will be required to submit a Corrective Action Plan to the Department if found non-compliant with the requirements.
- Require all SBHCs to develop and implement policies and procedures that document all Article 28 sponsor-supplied medication and related pharmaceutical supply transactions, including a system of records and bookkeeping for all medications and supplies in accordance with the policies of the Article 28 sponsor.
- Require physical inventories of medications and related pharmaceutical supplies kept at the SBHC be conducted in accordance with the policies of the Article 28 sponsor, at a minimum of quarterly, and verified in writing by the medical staff (e.g., medical director, nurse practitioner, nurse) of the SBHC. Policies and procedures must also include the reconciliation of inventory discrepancies as needed and disposition of expired medications. All physical inventories must be kept at the SBHC site and available for review by the Department or its agent (currently the Island Peer Review Organization IPRO) as requested.
- The two SBHCs that were found to be out of compliance by OSC auditors (Erasmus High School sponsored by NYU - Lutheran Medical Center and Seward Park

Educational Campus sponsored by Community Health Care Network) will receive a follow-up on-site visit within six months to verify correction of the deficiencies identified upon audit.

SBHC compliance with the requirements will continue to be assessed on an ongoing basis during on-site program reviews that are currently being conducted by IPRO. SBHCs are required to produce the policies and procedures related to security, inventory and control of medications and related supplies and the inventory log they use to demonstrate that they are adhering to their policies and procedures.