



## Department of Health

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April 6, 2015

Mr. John Buyce  
Audit Director  
New York State Office of the State Comptroller  
110 State Street, 11<sup>th</sup> Floor  
Albany, New York 12236

Dear Mr. Buyce:

Pursuant to the provisions of Section 170 of New York State Executive Law, I hereby transmit to you a copy of the New York State Department of Health's comments related to the Office of the State Comptroller's final audit report 2013-S-34 entitled, "New York City School-Based Health Centers: Security and Control over Medications and Related Supplies."

Please feel free to contact Amy Nickson, Office of Governmental and External Affairs at (518) 474-2011 with any questions.

Sincerely,

Howard A. Zucker, M.D., J.D.  
Acting Commissioner of Health

**Department of Health Comments on the  
Office of the State Comptroller's  
Final Audit Report 2013-S-34 entitled,  
New York City School-Based Health Centers: Security and Control  
Over Medications and Related Supplies**

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The following are the Department of Health's (Department) comments in response to the Office of the State Comptroller's (OSC) Final Audit Report 2013-S-34 entitled, "New York City (NYC) School-Based Health Centers (SBHCs): Security and Control Over Medications and Related Supplies."

The Department acknowledges the key finding that the SBHCs located in NYC sampled by OSC did not fully employ appropriate inventory controls over medications and related supplies. While it is understood that the lack of proper oversight of medication and supply inventories may result in "misuse, abuse, and harm" as noted in the report, the Department is not aware of the occurrence of any adverse outcomes being reported by the SBHCs sampled by OSC.

**OSC Recommendation:**

1. Develop guidelines for SBHCs to help ensure their compliance with governing regulations. The guidelines should include:
  - a. Requiring SBHCs to perform periodic physical inventories of their medications and sensitive medical supplies and reconcile discrepancies as appropriate;
  - b. Documenting all student-supplied medication transactions, including the type and quantity of the medication received or dispensed, as well as pertinent contacts with parents/guardians; and
  - c. Documenting the disposition of expired medications.

**DOH Response:**

The Department has updated the *New York State School - Based Health Center Principles and Guidelines* to include activities that address items (a-c). Revisions were made to the Organization and Management Policies and Procedures section and Quality Management and Improvement section of the *Principles and Guidelines*.

A new required policy and procedure for all SBHCs is one that addresses *security, inventory control and accountability for medications and related supplies (i.e., syringes and needles)*. Additionally, the guidelines indicate that the policy and procedure needs to include:

- 1) Performance of physical inventories of medications and sensitive medical supplies (i.e. syringes and needles) kept on site at the SBHC, to be conducted at least quarterly;
- 2) Reconciliation of inventory discrepancies as needed; and
- 3) Documented disposition of expired medications.

In those circumstances in which SBHCs store student-supplied medications, the Department has recommended that the SBHC document all student-supplied medication transactions, including the following:

- 1) Date, name and quantity of each medication received by the SBHC from the parent/guardian;
- 2) Parent/guardian contacts made by the SBHC regarding expired/unused medication;

- 3) Date, name and quantity of each medication returned by the SBHC to parent/guardian; and
- 4) Date, name and quantity of any medication disposed of by the SBHC.

A letter was sent electronically to the Medical Director of each SBHC on February 6, 2015, advising them of the requirement for developing and implementing policies related to *security, control and accountability over medications and related supplies*. All SBHC-sponsoring facilities will be required to attest to complying with the *SBHC Principles and Guidelines* on an annual basis and when opening a new SBHC. The revised SBHC Principles and Guidelines have been placed on the Department's website.

The content of the directive has been added to the program monitoring review tool used to assess SBHC-sponsoring facilities' compliance with the *SBHC Principles and Guidelines*. During on-site program reviews, SBHCs will be required to produce the policy and procedures they use to govern the control of medications and related supplies and demonstrate that they are adhering to the procedures.