

H. CARL McCALL
STATE COMPTROLLER



A.E. SMITH STATE OFFICE BUILDING
ALBANY, NEW YORK 12236

STATE OF NEW YORK
OFFICE OF THE STATE
COMPTROLLER

August 18, 1999

Mr. Carl T. Hayden
Chancellor of the Board of Regents
The University of the State of New York
State Education Building
Albany, NY 12234

Re: Report 99-F-14

Dear Mr. Hayden:

Pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law, we have reviewed the actions taken by officials of the State Education Department (Department) as of August 5, 1999, to implement the recommendations contained in our audit report, *State Education Department School District Health Services* (Report 96-S-6). Our report, which was issued on February 25, 1998, examined the health services provided in school districts in New York State, and the Department's oversight of the delivery of those services.

Background

The Department is the administrative agency of the State Board of Regents. Article 19 of the State Education Law (Article 19) and various other sections of the Education and Public Health Laws require school districts to provide a health services program for all students in public elementary and secondary schools, and in non-public schools upon request. The Department's Office of Elementary, Middle, Secondary and Continuing Education (Office) is responsible for enforcing school district compliance with Article 19's requirements pertaining to periodic health examinations and assessments, screening services, health referrals and immunization compliance at school districts. The Cities of New York, Buffalo and Rochester are exempt from most provisions of Article 19. However, local health departments in the exempt districts have developed their own policies and procedures for providing health services to students in these city schools.

According to Department officials, for the school year July 1, 1997 through June 30, 1998 (the most recent data available at the time of our review), New York State's 705 school districts

reported a total student enrollment of about 2.8 million, and total spending of \$27.9 billion. This included \$153.4 million in spending for student health services reported by 701 school districts. As of July 24, 1996, the Office reported that it had 593 full-time equivalent staff. As of April 15, 1999, the Office reported that it had 462 full-time equivalent staff, a reduction of 131 full-time equivalent staff.

Summary Conclusions

In our prior audit, we examined health care services provided by 15 school districts. We found that exempt school districts provided students with fewer health services than did non-exempt districts. Further, we concluded that Article 19's requirements should be updated and made applicable to all school districts, including exempt districts. We also found the Department did not monitor districts' compliance with Article 19. In addition, the Department did not collect information needed to evaluate school district health services operations, or to measure the success of its service-oriented approach.

In our follow-up review, we found Department officials have proposed legislation to amend Article 19. In addition, the Department has initiated the development of a school district self-assessment tool and performance measures to evaluate school health services.

Summary of Status of Prior Audit Recommendations

Of the six prior audit recommendations, Department officials have implemented two recommendations and partially implemented four recommendations.

Follow-up Observations

Recommendation 1

Reevaluate school district health services requirements and consider whether additional changes are necessary to improve the delivery of services and to reduce costs.

Status - Implemented

Agency Action - In response to our audit report, Department officials indicated that they have initiated a variety of activities to gather input about changes needed to improve the delivery of school health services. For example, the Department, in conjunction with the Statewide Advocacy for School Health Services Office, conducted 17 regional workshops with over 1,200 school health services staff during the winter and spring of 1999. Also, in April 1997, the Department introduced legislation to amend Article 19 in relation to the provision of school health services. The proposed legislation includes changes that would eliminate gender bias and redundancy. In addition, various outdated provisions of Article

19 would be repealed to ensure that school health examinations are provided in a manner consistent with current practices and with national standards. Department officials informed us that this legislation has not yet been passed.

Recommendation 2

Assess the extent to which additional Department resources can be dedicated to monitoring school district health services and ensuring that districts comply with Article 19's requirements.

Status - Partially Implemented

Agency Action - Department officials indicated that they are working to develop a school district self-assessment tool to determine compliance with school health service mandates. This is a two-year project which was piloted at school districts in the Fall of 1998. In addition, the Department conducted coordinated program monitoring in four school districts during 1997-1998 that included review of school health services. However, as indicated in our prior audit, Department officials believe that providing training and technical assistance rather than monitoring school districts enables them to best utilize their limited personnel resources.

Recommendation 3

Develop health services performance measures and an information system to gather critical health services data from school districts to enhance the Department's ability to monitor districts' health services programs.

Status - Partially Implemented

Agency Action - As previously mentioned, the Department is working to develop a self-assessment tool that school districts can use to monitor their health services programs and measure their performance. As part of this project, a survey was sent to 198 randomly selected school buildings across New York State (excluding schools in NYC, Buffalo, Syracuse, Albany and Rochester) in March 1999. Department officials indicated that after all surveys are returned, results will be tabulated and converted into a rubric format to demonstrate each school's level of performance. School nurses and building administrators will be invited to a post survey meeting in October 1999 to review results and determine a plan for improvement in their school health services. After the pilot project is completed, school districts will be selected by random sampling for compliance with Article 19 requirements.

Recommendation 4

Identify and evaluate significant variances among districts in the services provided, methods of delivery, type and amount of staffing and cost per student.

Status - Partially Implemented

Agency Action - Department officials indicated that, since our audit, School District Superintendents assisted the Department with the conduct of a survey to identify baseline data in relation to school health services staffing. The data gathered was limited to enrollment and the number of nurses at each district. Department officials indicated that they are in the process of evaluating this data, and plan to compare student/nurse ratios among school districts and to national averages.

Recommendation 5

Establish and coordinate a process for sharing health services experiences and approaches among school districts.

Status - Partially Implemented

Agency Action - As mentioned previously, Department officials indicated that they conducted 17 workshops around the State between January and May 1999, to provide school nursing personnel, school physicians and administrators an opportunity to review and discuss mandates and guidelines for providing health services to New York State students and to gather input about changes needed to improve the delivery of school health services. In addition, officials indicated that they plan to develop a website for school districts during 1998-1999 that will offer information about school health services policies and practices.

Auditors' Comments - We believe that the Department should schedule these workshops periodically to create an established process for sharing health services experiences and approaches among school districts.

Recommendation 6

Review the techniques used by other states to oversee school district health services and determine if New York State should model an existing monitoring system or develop its own.

Status - Implemented

Agency Action - Department officials indicated that nurse consultants in 25 states were contacted about each state's evaluation and monitoring process for school health services programs. According to Department officials, ten consultants indicated that demographic information about health services personnel and programs is measured in their states. However, the results showed that no state uses standards, performance measures, best practices and a comprehensive school health wellness approach to evaluate or monitor school health services. For this reason, the Department developed a self-assessment tool to provide consistency with educational strategies already utilized in New York State and also to allow schools the opportunity to self-assess and monitor their own school health services.

Major contributors to this report were Karen Bogucki and Tom Kulzer.

We would appreciate your response to this report within 30 days, indicating any action planned or taken to address the unresolved matters discussed in this report. We also thank Department management and staff for the courtesies and cooperation extended to our auditors during this review.

Very truly yours,

Jerry Barber
Audit Director

cc: Charles Conaway