

ALAN G. HEVESI
COMPTROLLER



110 STATE STREET
ALBANY, NEW YORK 12236

STATE OF NEW YORK
OFFICE OF THE STATE COMPTROLLER

September 6, 2006

Dr. Matthew Goldstein
Chancellor
City University of New York
555 East 80th Street
New York, New York 10021

Re: Report 2006-F-9

Dear Chancellor Goldstein:

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 followed-up on the actions taken by officials of the City University of New York (CUNY) to implement the recommendations contained in our audit report, *City University of New York -Immunization Compliance* (Report 2004-S-3).

Background, Scope and Objectives

The City University of New York, the largest urban university in the nation, has 11 senior colleges, 6 community colleges, a graduate school, and a law school. To implement the requirements of Section 2165 of the State Public Health Law (Law), the CUNY Tuition and Fee Manual states that all degree and non-degree students born after December 31, 1956, who are registered for six or more credits, are prohibited from attending classes until they provide proof or documentation that they received two immunizations for measles and one immunization each for mumps and rubella. In lieu of such proof, the student may receive inoculations at the college or present a physician's report indicating that the student has developed immunity from previous exposure to the disease. In addition, exemptions from the inoculations may be given for medical or religious reasons.

CUNY procedures require that the registration for all students entering the college be blocked until these immunization requirements are met. If the student does not present satisfactory proof that the immunization requirements have been met, the student should be excluded from attending class and the disbursement of financial aid should be prevented. In addition, the student is to be given a withdrawal with approval (WA) grade for any registered courses, and should be restricted from future class registration.

CUNY's Central Office of Student Health Services (SHS) oversees compliance with the immunization requirement at the 19 CUNY campuses. SHS disseminates information, conducts meetings with each campus Health Service Officer and arranges for clinics where students can receive their required inoculations. At the end of each calendar year, each college is required to submit a report to SHS indicating

the total number of students who were enrolled for six or more credits and either received the required measles, mumps, or rubella immunizations, or obtained medical or religious exemptions. SHS compiles and summarizes these data in an annual New York State Post-Secondary Immunization Survey (Survey) report to the New York State Department of Health (Department).

Our initial audit report, which was issued on October 21, 2004, examined CUNY colleges' compliance with the Law that requires certain students to be immunized against measles, mumps and rubella diseases. We also determined if records of immunizations were properly stored by the campuses and reported correctly by SHS to the Department. The objective of our follow-up, which was conducted in accordance with generally accepted government auditing standards, was to assess the extent of implementation as of August 1, 2006 of the four recommendations included in our initial report.

Summary Conclusions and Status of Audit Recommendations

We found that CUNY officials have made progress in correcting the problems we identified. However, additional improvements are needed. Of the four audit recommendations, one recommendation has been implemented and three recommendations have been partially implemented.

Follow-up Observations

Recommendation 1

Maintain and file records of student immunizations properly in a secure location.

Status - Fully Implemented

Agency Action - This recommendation addressed a condition that existed at Baruch College at the time of our initial review. Student health records are now maintained in a secured location. All drawers containing student records are locked and inaccessible to non-health-related personnel.

Recommendation 2

Issue guidelines to all colleges detailing what is acceptable documentation of immunization and provide clarification to the colleges regarding what is acceptable documentation for religious waivers.

Status - Partially Implemented

Agency Action - SHS has not issued specific guidelines to all colleges regarding acceptable documentation of immunization or religious waivers. However, SHS officials stated that they disseminate DOH guidelines to College health directors. In addition, they said they advise these directors to forward questionable waivers to SHS for review. Such waivers may then be shared with officials at CUNY Legal and DOH, who may provide guidance.

Recommendation 3

Determine why students without religious or medical waivers are included in the totals for those categories on the SIMS report at CSI. Adjust the report so that the correct total for these categories is calculated.

Status - Partially Implemented

Agency Action - Students without religious or medical waivers are included in the total for those categories on the Student Information Management System (SIMS) report at CSI because SIMS does not allow any other category of reporting besides medical or religious exemptions. However, CSI officials are developing a program for identifying and accounting for study abroad students and distinguishing them from students who have received medical or religious waivers. This program will allow college officials to count these individuals correctly for reporting purposes. Students registered in the study abroad program, the American University of Rome-CSI Articulation Program, are not required to provide a waiver document because they exclusively study abroad.

Recommendation 4

Provide clear instructions to all colleges indicating how the data for the annual immunization compliance report is to be compiled and reported.

Status - Partially Implemented

Agency Action - The Annual Immunization Survey Report, a New York State Department of Health reporting form that all colleges must submit, includes instructions that assist in completing the form. However, SHS has provided no additional instructions to CSI on how to properly report the study abroad students registered in the American University of Rome-CSI Articulation Program.

Major contributors to this report were Tom Trypuc, Harry Maher and Bebe Hussain Belkin.

We would appreciate your response to this report within 30 days, indicating any actions planned to address the unresolved issues discussed in this report. We also thank the management and staff of the CUNY for the courtesies and cooperation extended to our auditors during this process.

Very truly yours,

Kenrick A. Sifontes
Audit Manager

cc: David Rankert, CUNY - Internal Audit