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UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

CIVIL DIVISION

B-118638

Dear Mr. Washington:

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The General Accounting Office has reviewed the administration of the Supplemental Food Program by the District of Columbia's Community Health Services Administration. Our review was directed primarily toward determining whether the program was being administered in a manner consistent with the Administration's Plan of Operation as approved by the Department of Agriculture. Our review was directed further toward the implementation of the program in the District's neighborhood health clinics but did not include a review of the implementation of the program by participating private physicians.

The Department of Agriculture criteria for determining program eligibility consist of a financial component and a medical component.

We found that the Plan of Operation did not provide an appropriate basis for making income determinations to establish program eligibility and that, contrary to the Department of Agriculture criteria, persons who could not be classified as low-income persons were participating in the program. We found also that, contrary to the Plan of Operation, the Administration did not attempt to determine whether an applicant met the medical-need criterion for the program and that therefore there was no assurance that the program was being made available only to medically needy persons.

The problems noted during our review and discussed in the following sections have been brought to the attention of the Director, Community Health Services Administration. The Director indicated that he would consider taking corrective action relative to our finding on the income-eligibility criterion and stated that corrective action had been taken relative to our finding on the medical-need criterion.

INCOME ELIGIBILITY

The program summary section of the Plan of Operation indicates that the Supplemental Food Program is directed at persons in low-income

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families, and section I.D. of the plan describes the basis for identifying these persons as follows:

"Of the 850,000 residents of the District of Columbia, between 200,000-334,000 (depending on definitions) are considered to be indigent or medically indigent. The users of Health Department services are patients from this low-income group." (Underscoring supplied.)

The effect of this provision is to make all users of the health services eligible for the Supplemental Food Program on the basis of the assumption that all users have low incomes. We discussed the basis for this policy with officials of the Administration who stated that the number of users of the health services who were not low-income persons was minimal. We were advised that documentation to support this position was not available.

Regarding income-eligibility requirements for the Supplemental Food Program, Department of Agriculture program regulations provide that persons who, after a consideration of income, have been found eligible for any existing Federal, State, or local food, health, or welfare programs for low-income persons will be considered to be low-income persons for purposes of determining eligibility for the Supplemental Food Program. Our review showed that the most liberal low-income program in the District in terms of income-eligibility requirements was the Medical Assistance Program. Therefore persons who were ineligible for the Medical Assistance Program would also be ineligible for the Supplemental Food Program.

A test we conducted during the week of May 17 to 21, 1971, at the H Street Neighborhood Health Center showed that, of the 210 persons with scheduled medical appointments during that week, 109 had been determined to be eligible for the Medical Assistance Program. The remaining 101 persons either had been determined to be ineligible for the Medical Assistance Program, and therefore ineligible for the Supplemental Food Program, or had not had their eligibility determined. The following table categorizes the status of the 101 persons.

<u>Category</u>	<u>Number</u>
Ineligible for Medical Assistance Program	23
Applications pending	4
Income status not known	<u>74</u>
Total	<u>101</u>

At our request a District Medicaid social worker attempted to interview the 74 persons. The social worker determined that 12 of the 24 persons she successfully interviewed were ineligible for the Medical Assistance Program. We screened those 12 persons against the Supplemental Food Program log book at the clinic and found that nine of the 12 were participating in the Supplemental Food Program.

We did not make similar tests at the other District health clinics. We noted, however, that the Department of Human Resources' pamphlet, "Demographic, Social and Health Characteristics of the Residents of the District of Columbia," indicated that service area 6, the service area in which the H Street Neighborhood Health Center was located, ranked the poorest on most characteristics--an indication that it had the most residents with socioeconomic and health-related problems. Therefore it is possible that as many, or perhaps more, users of health clinics in more affluent service areas would not be low-income persons.

Recommendation

We recommend that the Administration establish a procedure which requires that income eligibility for the Supplemental Food Program be determined on the basis of eligibility for the District's Medical Assistance Program. As a result of this procedure, eligibility determinations would have to be made for only those persons who apply for the Supplemental Food Program and whose eligibility for the Medical Assistance Program has not been determined.

MEDICAL ELIGIBILITY

At the time of our review, section I.D. of the Plan of Operation stated:

"The clinic physician and the professional staff under his direction shall be the sole authorities in determining the eligibility of those patients in the susceptible groups who may obtain supplemental foods for health reasons." (Underscoring supplied.)

Section III. A.b. of the Plan of Operation describes the method of determining which persons are eligible for authorization as follows:

"The physician or professional staff members under his direction, i.e. nurses, nutritionists, social workers will order supplemental food for the patient. An examination by the physician or review of the patient's medical record will be made before food is ordered."

These sections of the Plan of Operation indicate that, for an applicant to meet the medical-eligibility criterion for the Supplemental Food Program, a physician or other professional staff member must make a determination, based on either a physical examination by a physician or a review of a patient's medical record, that the applicant needs the supplemental food for health reasons.

Our review showed that physicians were not making determinations of medical need and that, under procedures in effect at the time of our review, an applicant could receive authorization for the program without being seen by a physician or without having his or her medical record reviewed. Clinic physicians and other professional staff, as well as officials in the Supplemental Food Program Division contacted during our review, indicated that eligibility for the program was considered to be automatic for all persons in the groups toward which the program was directed (infants, preschool children, and women during and 12 months after pregnancy).

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We discussed this matter with the Director of the Administration and the Chief of the Supplemental Food Program Division who advised us that, subsequent to our fieldwork, the procedure for determining eligibility for the program had been revised to include such a determination by appropriate medical persons so as to ensure that applicants had a medical need for the food available under the program. In our opinion, this approach is consistent with the objectives of the program.

We suggest that, to attain uniform implementation of the program, the Administration notify the responsible officials in the neighborhood health clinics that a determination of medical need for the Supplemental Food Program is necessary.

We shall appreciate receiving your views on the matters discussed in this report.

Sincerely yours,

A. T. Samuelson

Director, Civil Division

The Honorable Walter E. Washington
Commissioner of the District of Columbia 250

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