



# Centers for Independent Living

## San Antonio Independent Living Services

## Results in Brief

### Why OIG Conducted This Audit

The Texas Health and Human Services (HHS) Office of Inspector General Audit and Inspections Division (OIG Audit) initiated this audit in response to risks HHSC identified regarding Independent Living Services program performance, including Center for Independent Living (CIL) service delivery and utilization of funds.

In 2023, HHSC contracted with San Antonio Independent Living Services (SAILS) and 10 additional CILs across Texas to provide purchased services to people with significant disabilities. HHSC paid CILs more than \$8.9 million to provide purchased services, and CILs provided purchased services for 2,508 people that year.

### Summary of Review

The audit objective was to determine whether SAILS had established processes and controls for providing independent living services in compliance with selected standards, rules, and contractual requirements. The audit scope covered services provided under the independent living purchased services contract for September 1, 2022, through August 31, 2023.

### Conclusion

San Antonio Independent Living Services (SAILS), a center for independent living (CIL), generally complied with requirements when providing purchased services, which include goods and services purchased to assist people in meeting their independent living goals. SAILS should develop specific procedures for providing services that include the requirements of the Health and Human Services Commission's (HHSC's) Independent Living Services Standards for Providers handbook (ILS Standards).

### Key Results

SAILS generally complied with ILS Standards when providing independent living purchased services. While not all cases tested resulted in a requested service being provided, for 32 case files tested SAILS complied with the applicable requirements related to:

- Documenting initial contact.
- Determining eligibility.
- Obtaining supporting information including evaluations.
- Obtaining HHSC's prior approval of large purchases.
- Providing and verifying receipt of requested services.

For eight case files that required prior approval of purchases by HHSC, SAILS completed the purchases within the required 90 days of approval.

Additionally, SAILS management reviewed and approved each case that resulted in SAILS providing a requested service. Prior to initiating a purchase, SAILS uses a case file checklist to document significant information included in the case file, including management review and approval of the completed case file. For each of the 12 cases that resulted in SAILS providing a requested service, SAILS management documented their review and approval

## Background

The Independent Living Services program provides services that promote the integration and inclusion of individuals with significant disabilities into society. Under this program, HHSC contracts with CILs to provide core and purchased services. Core services include information and referral, skills training, advocacy, peer counseling, and transition services. Purchased services include goods and services a CIL purchases from a vendor to help people meet their independent living goals, such as mobility training, home modifications, prosthetics, hearing aids, wheelchairs, and durable medical equipment.

The service delivery process includes:

- Documenting initial contact with a person requesting services.
- Completing an application for services with the person.
- Determining an applicant's eligibility based on a diagnosis of a significant disability.
- Completing an independent living plan with the applicant.
- Obtaining evaluations, vendor quotes for purchased services, and prior approval from HHSC for certain large purchases.
- Providing requested services and verifying that the applicant received the services.

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of the case file documentation prior to initiating the purchased services.

While SAILS followed most requirements when providing purchased services for independent living, it did not meet all requirements, including those related to completing applications, completing independent living plans, obtaining vendor quotes, and developing policies and procedures. Specifically:

- Ninety-six percent of applicable case files tested included the required information in the applications SAILS completed with the individuals requesting services. For one of the 28 (4 percent) applicable case files, SAILS did not include the requested services.
- While 88 percent of applicable case files tested included all required elements in the applicants' independent living plans, for two of the 17 applicable case files SAILS did not document the anticipated duration of the service plan.
- For three of six (50 percent) case files tested that required quotes from two separate vendors, SAILS did not obtain two quotes.
- While SAILS meets many of the requirements for which ILS Standards requires a written policy, it does not always meet the requirement to create the policy itself.

## Recommendations

SAILS should:

- Update its policies and procedures to provide specific steps and guidance for developing and reviewing supporting case file documentation for requested services, including policies and procedures related to completing applications, completing independent living plans, and obtaining multiple quotes.
- Develop policies and procedures required by the ILS Standards.

## Management Response

OIG Audit presented preliminary audit results, issues, and recommendations to SAILS in a draft report dated March 13, 2025. SAILS indicated it had already implemented the corrective actions. SAILS's action plans are included in the report.