

# Audit Report

## AllOne Health Resources, Inc.

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An Employee Assistance Program  
Services Provider Contracted with the  
Texas Department of Family and  
Protective Services

April 9, 2025

OIG Report No. AUD-25-012



**Inspector  
General**

Texas Health  
and Human Services



# AllOne Health Resources, Inc.

An Employee Assistance Program Services Provider Contracted with the Texas Department of Family and Protective Services

## Results in Brief

### Why OIG Conducted This Audit

The Texas Health and Human Services (HHS) Office of Inspector General (OIG) Audit and Inspections Division (OIG Audit) conducted an audit of AllOne Health Resources, Inc. (AllOne Health). OIG initiated this audit in response to Texas Department of Family and Protective Services (DFPS) stakeholders' concerns about employee assistance program (EAP) services for employees in high-stress jobs who received critical incident support services and secondary traumatic stress support services after experiencing a traumatic event in the course of their work.

DFPS paid AllOne Health to provide EAP services for 11,626 eligible individuals during state fiscal year 2024. As of September 5, 2024, DFPS had paid AllOne Health \$47,562 for EAP services under the contract effective April 1, 2024, which defines a maximum value of \$2,025,000 to cover two contract years and three annual extensions. During state fiscal year 2024, AllOne Health established 1,317 EAP cases and provided services to 909 individuals through its contract with DFPS.

### Summary of Review

The audit objective was to determine whether AllOne Health complied with selected DFPS EAP contractual requirements.

The audit scope covered the period from April 1, 2024, through August 31, 2024.

### Conclusion

AllOne Health Resources, Inc. (AllOne Health) is an employee assistance program (EAP) services provider. AllOne Health contracted with the Texas Department of Family and Protective Services (DFPS) and provided timely rapid response critical incident services to DFPS participants as required.

However, AllOne Health did not comply with some requirements for counselor qualifications; training and related requirements; insurance participation; customer satisfaction surveys; and quarterly utilization reporting.

### Key Results

While AllOne Health, through its subcontractor, provided rapid response critical incident services to DFPS participants timely, it did not:

- Verify two counselors met required qualifications.
- Require eight counselors to complete required training and view required DFPS videos before providing counseling services.
- Verify counselors providing rapid response critical incident services to DFPS participated in the state of Texas employee insurance network.
- Send customer satisfaction surveys to all DFPS participants who received rapid response critical incident services.
- Include 10 required reporting categories in two quarterly reports it submitted to DFPS.

## Background

DFPS contracts with AllOne Health to provide confidential assistance services to DFPS participants. EAP services assist individuals with personal concerns that may affect job performance and include problem assessment, short-term counseling, and referrals to appropriate community and private services.

Additionally, DFPS's contract with AllOne Health includes rapid response critical incident services, which consist of:

- Critical incident support services to provide counseling to individuals who experience job-related critical incidents or other circumstances significantly impacting the workplace.
- Secondary traumatic stress support for individuals or groups experiencing ongoing stress brought on by exposure to the stressful or traumatic experience of another person.

During the audit scope, AllOne Health provided rapid response critical incident counseling services to 94 DFPS participants through 23 counseling services facilitated by eight counselors.

## Management Response

AllOne Health's action plans described how its current processes, under the ownership change effective October 1, 2024, either already implemented the corrective action or would facilitate implementing the corrective action by May 2025. OIG Audit has not reviewed these new processes and therefore cannot conclude on their effectiveness.

For more information, contact:  
[OIGAuditReports@hhs.texas.gov](mailto:OIGAuditReports@hhs.texas.gov)

## Recommendations

AllOne Health should:

- Develop and implement policies and procedures to:
  - Verify counselors meet licensing requirements.
  - Maintain documentation of one-time counseling agreements and evidence it verified associated counselor licenses or certifications, education, and experience.
  - Require counselors to complete required training and view required DFPS videos before providing counseling services.
  - Respond to DFPS requests for rapid response critical incident services through counselors who participate in the state of Texas employee insurance network.
- Survey DFPS participants who receive rapid response critical incident services to obtain contractually required information.
- Include all contractually required information in the quarterly utilization reports it submits to DFPS.

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# Audit Overview

## Overall Conclusion

AllOne Health Resources, Inc. (AllOne Health),<sup>1</sup> is an employee assistance program (EAP) services provider. AllOne Health contracted with the Texas Department of Family and Protective Services (DFPS) and provided timely rapid response critical incident services to DFPS participants<sup>2</sup> as required.

However, AllOne Health did not comply with some requirements for counselor qualifications; training and related requirements; insurance participation; customer satisfaction surveys; and quarterly utilization reporting.

## Key Audit Results

While AllOne Health, through its subcontractor, provided rapid response critical incident services to DFPS participants timely, it did not:

- Verify two counselors met required qualifications.
- Require eight counselors to complete required training and view required DFPS videos before providing counseling services.
- Verify counselors providing rapid response critical incident services to DFPS participated in the state of Texas employee insurance network.
- Send customer satisfaction surveys to all DFPS participants who received rapid response critical incident services.
- Include 10 required reporting categories in two quarterly reports it submitted to DFPS.

### Objective

The audit objective was to determine whether AllOne Health complied with selected DFPS EAP contractual requirements.

### Scope

The audit scope covered the period from April 1, 2024, through August 31, 2024.

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<sup>1</sup> During the audit scope, AllOne Health was known as Deer Oaks EAP Services, LLC. On October 1, 2024, Deer Oaks EAP Services, LLC, became AllOne Health after an ownership change.

<sup>2</sup> DFPS's contract with AllOne Health defines participants as DFPS employees, including former employees up to one year post-employment, and their direct family or household members.

OIG Audit offered recommendations to AllOne Health, which, if implemented, will improve compliance with applicable requirements.

The “Detailed Audit Results” section of this report presents additional information about the audit results and is considered written education in accordance with Texas Administrative Code.<sup>3</sup> In addition, other audit issues identified in this report may be subject to liquidated damages or OIG administrative enforcement measures,<sup>4</sup> including administrative penalties.<sup>5</sup> This report does not address compliance beyond the scope and objective of this audit.

OIG Audit presented preliminary audit results, issues, and recommendations to AllOne Health in a draft report dated March 18, 2025. AllOne Health’s action plans described how its current processes, under the ownership change effective October 1, 2024, either already implemented the corrective action or would facilitate implementing the corrective action by May 2025. OIG Audit has not reviewed these new processes and therefore cannot conclude on their effectiveness. AllOne Health’s management responses, including its action plans, are included in the report following each recommendation.

OIG Audit communicated other, less significant issues to AllOne Health in a separate written communication.

OIG Audit thanks management and staff at both AllOne Health and its subcontractor for their cooperation and assistance during this audit.

#### **What Prompted This Audit**

OIG initiated this audit in response to DFPS stakeholders’ concerns about EAP services for employees in high-stress jobs who received critical incident support services and secondary traumatic stress support services after experiencing a traumatic event in the course of their work.

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<sup>3</sup> 1 Tex. Admin. Code § 371.1701 (May 1, 2016).

<sup>4</sup> 1 Tex. Admin. Code § 371.1603 (May 20, 2020).

<sup>5</sup> Tex. Gov. Code § 531.102 (Sept. 1, 2021).

## Key Program Data

DFPS contracts with AllOne Health to provide confidential assistance services to DFPS participants. EAP services assist individuals with personal concerns that may affect job performance and include problem assessment, short-term counseling, and referrals to appropriate community and private services. Additionally, DFPS's contract with AllOne Health includes rapid response critical incident services, which consist of:

- Critical incident support services to provide counseling to individuals who experience job-related critical incidents or other circumstances significantly impacting the workplace.<sup>6</sup>
- Secondary traumatic stress support for individuals or groups experiencing ongoing stress brought on by exposure to the stressful or traumatic experience of another person.

During the audit scope, AllOne Health provided rapid response critical incident counseling services to 94 DFPS participants<sup>7</sup> through 23 counseling services facilitated by eight counselors.

Throughout the audit scope, AllOne Health used a subcontractor to provide many of its DFPS-contracted EAP services. On January 31, 2025, which was after the audit scope, AllOne Health ended this subcontracting relationship and began providing DFPS-contracted EAP services internally. Appendix B provides additional information about AllOne Health's contracts with DFPS and the subcontractor.

### Contract Details

DFPS paid AllOne Health to provide EAP services for 11,626 eligible individuals during state fiscal year 2024, which covered the period from September 1, 2023, through August 31, 2024. As of September 5, 2024, DFPS had paid AllOne Health \$47,562 for EAP services under the contract effective April 1, 2024, which defines a maximum value of \$2,025,000 to cover two contract years and three annual extensions.

During state fiscal year 2024, AllOne Health established 1,317 EAP cases and provided services to 909 individuals through its contract with DFPS.

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<sup>6</sup> Critical incidents may include workplace accidents or death of a family member, DFPS employee, or individual receiving DFPS services. Critical incident support services may also address secondary trauma, grief, or loss associated with critical incidents.

<sup>7</sup> The number of DFPS participants is based on individual counselor reports.

## **Auditing Standards**

### **Generally Accepted Government Auditing Standards**

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.



# Detailed Audit Results

The results of this audit reflect actions performed by both (a) AllOne Health and (b) its subcontractor, which AllOne Health is responsible for overseeing. Specifically, AllOne Health prepared quarterly and annual reports, and its subcontractor was responsible for:

- Responding to critical incidents.
- Providing counseling.
- Maintaining the data AllOne Health used to prepare the quarterly and annual reports.

Through its contract with DFPS, AllOne Health is ultimately responsible for the actions of its subcontractor.<sup>8</sup>

AllOne Health's subcontractor provided timely rapid response critical incident services to DFPS as required. However, AllOne Health did not comply with some requirements for (a) counselor qualifications; training and related requirements; and insurance participation, (b) customer satisfaction surveys, and (c) quarterly utilization reporting.

The following sections of this report provide additional detail about the findings of noncompliance identified by OIG Audit.

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<sup>8</sup> DFPS Contract #HHS001365400001, Attachment B, § VII.T (Apr. 1, 2024).

## **Chapter 1: AllOne Health Did Not Comply with Some Counselor Requirements**

AllOne Health did not comply with some requirements for counselor qualifications; training and related requirements; and insurance participation.

### **Counselor Qualifications**

AllOne Health's subcontractor did not verify that two counselors met required qualifications. AllOne Health must deliver counseling services through providers who meet minimum requirements for licensing or certification, education, and experience.<sup>9</sup> When DFPS participants receive EAP services from counselors without required qualifications, these services may not be effective or may worsen existing concerns.

### **Counselor Recredentialing**

For two rapid response critical incident requests from DFPS in May and July 2024, AllOne Health's subcontractor delivered counseling services through a counselor with an expired license. AllOne Health's subcontractor performs a recredentialing process every three years and verified this counselor's licensing in February 2023. However, AllOne Health's subcontractor did not verify the license was renewed after its expiration in October 2023.

### **One-Time Counseling Agreements**

For a third rapid response critical incident request from DFPS in July 2024, AllOne Health's subcontractor delivered counseling services using a one-time counseling agreement<sup>10</sup> with a second counselor. AllOne Health's subcontractor was unable to provide (a) the signed one-time counseling agreement or (b) evidence it verified the counselor's license or certification, education, and experience. AllOne Health's subcontractor confirmed it did not maintain documentation to support it followed its one-time counseling agreement process.

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<sup>9</sup> DFPS Contract #HHS001365400001, Attachment A, § II.G (Apr. 1, 2024).

<sup>10</sup> AllOne Health's subcontractor asserted it used one-time counseling agreements and license verifications when it could not provide a counselor it directly employed or one within its contracted network of providers.

## Training and Related Requirements

Of the eight counselors AllOne Health's subcontractor provided to deliver 23 rapid response critical incident services to DFPS participants, seven (87.5 percent) counselors did not complete the required training or view the two required DFPS videos before providing services. The remaining counselor responded to two of four requests for rapid response critical incident services before completing the required training and viewing the two required DFPS videos.

Before delivering services to DFPS participants, AllOne Health must certify that each counselor it provides has (a) completed six hours of training in trauma-informed care and secondary trauma or vicarious trauma and (b) viewed two videos covering DFPS-worker roles and responsibilities.<sup>11</sup> In December 2023, AllOne Health requested an exception from DFPS to delay implementation of the training and video requirements until September 2024; however, AllOne Health was unable to provide evidence DFPS approved the implementation delay. When an EAP services provider delivers services to DFPS participants through counselors who have not completed DFPS-specific training, the counselors providing services may not understand the specific traumas DFPS participants experience in the course of their work.

## Insurance Participation

AllOne Health did not require its subcontractor to respond to DFPS requests for rapid response critical incident services through counselors who participated in the state of Texas employee insurance network. As a result, AllOne Health's subcontractor delivered these counseling services to DFPS participants through four out-of-network counselors.

Per its contract with DFPS, AllOne Health must recruit and maintain a network of counselors who participate in the state of Texas health insurance network.<sup>12</sup> If an EAP provider does not deliver counseling services through in-network counselors, participants may not have the option to use their health insurance benefits to continue receiving services from the same counselor.

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<sup>11</sup> DFPS Contract #HHS001365400001, Attachment A, § II.G (Apr. 1, 2024).

<sup>12</sup> DFPS Contract #HHS001365400001, Attachment A, § II.G (Apr. 1, 2024).

## Recommendation 1

AllOne Health should develop and implement policies and procedures to:

- A. Verify counselors meet licensing requirements.
- B. Maintain documentation of one-time counseling agreements and evidence it verified associated counselor licenses or certifications, education, and experience.
- C. Require counselors to complete required training and view required DFPS videos before providing counseling services.
- D. Respond to DFPS requests for rapid response critical incident services through counselors who participate in the state of Texas employee insurance network.

## Management Response

### Action Plan

- A. AllOne Health confirms that its Affiliate Network Management Team verifies that each affiliate provider meets established licensing requirements prior to being accepted into our affiliate network.

Each provider must meet the following minimum requirements:

- A master's degree in behavioral health field, such as social work, counseling, or psychology.
- At least three (3) years post-master's clinical experience in a mental health setting.
- Mental health and chemical dependency assessment experience, knowledge, and skill.
- Solid knowledge of and demonstrated ability in providing short-term, solution-oriented interventions.
- Experience, ability, and willingness to provide referral liaison, collateral contact, follow-up, and case management services.
- At least one (1) year of EAP-specific experience.

- Current state licensure and certification.
- Professional liability insurance limits of a minimum of \$1 million per occurrence/\$3 million aggregate.

The requirements and counselor credentials are verified by internal staff who also review each provider's clinical staff application, resume, and licensure. We maintain personnel files containing all appropriate information and documentation on all affiliate providers seeking approval to join our EAP network. Our Affiliate Network Management Team is responsible for continuously monitoring affiliate credentials and service delivery. Re-credentialing is completed on a quarterly basis by verifying license(s)/certification(s) are up-to-date and active without restrictions.

- B. AllOne Health no longer conducts one-time counseling agreements.
- C. AllOne Health has established a structured training process to ensure compliance with DFPS affiliate provider training requirements. A designated Provider Relations Recruiter oversees this process for all State of Texas providers seeking inclusion in the DFPS provider network. The action plan includes:
  - The Provider Relations Recruiter will send a training request to each credentialed affiliate provider within the State of Texas provider network.
  - Each provider must complete six one-hour trauma-informed care/secondary/ vicarious trauma virtual training sessions, internally developed by AllOne Health.
  - Providers must also view the DFPS-mandated videos available on the DFPS public website: *The CPS Experience (2010)* (texas.gov) and *Job Preview Video: Working for Adult Protective Services* (texas.gov).
  - Upon completion, each provider will receive a Certificate of Completion, which will be stored in AllOne Health's customer database.
  - The provider will then be marked as approved to receive DFPS EAP referrals.

To ensure ongoing compliance, AllOne Health will:

- Conduct quarterly audits of training records to verify compliance.
- Implement automated tracking of provider training status.

This action plan ensures that all providers meet DFPS training requirements before rendering services, strengthening compliance and service quality.

D. AllOne Health is implementing a structured process to ensure that only eligible EAP providers that also participate within the State of Texas employee insurance network are assigned to conduct DFPS rapid response critical incident services. The action plan includes:

- Two designated critical incident response coordinators will oversee and ensure that only approved providers are assigned to DFPS critical incident response events.
- A new designation system is being implemented in AllOne Health's customer database to track critical incident response providers who also participate in the State of Texas employee insurance network.
- Before assigning a provider, our critical incident response coordinators will verify eligibility using the customer database designation and/or verbal confirmation from the provider.

To enhance compliance and monitoring, AllOne Health will:

- Conduct quarterly audits to ensure only approved providers are utilized.
- Provide additional training to our critical incident response coordinators on compliance requirements.
- Implement automated reporting to track DFPS critical incident response event assignments.

By implementing these measures, AllOne Health will ensure full compliance with DFPS requirements and strengthen the integrity of its rapid response critical incident services.

AllOne Health is committed to addressing these findings and ensuring compliance with DFPS requirements. We will continue to monitor our progress, conduct internal audits, and make improvements as necessary. A follow-up review will be conducted within six (6) months to confirm the effectiveness of these corrective actions.

**Responsible Manager**

Executive Director

**Target Implementation Date**

- A. April 1, 2025
- B. Not applicable
- C. April 1, 2025
- D. April 1, 2025

## Chapter 2: AllOne Health Did Not Survey DFPS Participants as Required

AllOne Health's subcontractor did not send customer satisfaction surveys to DFPS participants who received rapid response critical incident services as required. Instead, AllOne Health's subcontractor surveyed its DFPS points of contact, who requested the rapid response critical incident services from AllOne Health. Additionally, the surveys AllOne Health's subcontractor sent to the DFPS points of contact did not collect some required information, such as the individual's (a) division or program or (b) satisfaction with the EAP service location convenience, educational materials, or referrals.

Per its contract with DFPS, AllOne Health must survey DFPS participants who receive EAP services, including rapid response critical incident services, to determine their level of satisfaction with the services provided. This customer satisfaction survey must collect specific information as outlined in the contract.<sup>13</sup>

AllOne Health's subcontractor asserted it did not have contact information for the DFPS participants who received EAP services. Additionally, AllOne Health did not require its subcontractor to modify the standard surveys it used for all clients to collect the DFPS-required information.

When DFPS participants receiving EAP services do not receive a customer satisfaction survey that covers required information, DFPS is unable to assess EAP-service quality and DFPS participant satisfaction.

### Recommendation 2

AllOne Health should survey DFPS participants who receive rapid response critical incident services to obtain contractually required information.

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<sup>13</sup> DFPS Contract #HHS001365400001, Attachment A, § II.R (Apr. 1, 2024).



## Management Response

### Action Plan

To ensure compliance with DFPS requirements, AllOne Health will implement a standardized survey process to collect feedback from DFPS rapid response critical incident participants. The action plan includes the following steps:

- A survey link will be created and included in the critical incident stress debriefing and secondary traumatic stress support (CISD/STSS) confirmation email sent to the DFPS requestor.
- The DFPS requestor will be responsible for sharing the survey link with all attendees of the rapid response critical incident event.
- AllOne Health will capture and analyze the survey results.
- The survey findings will be incorporated into the utilization review summary submitted to DFPS.

To enhance compliance and data collection, AllOne Health will:

- Implement automated tracking to monitor survey responses.
- Conduct quarterly reviews of survey feedback to identify trends and areas for improvement.
- Ensure that survey participation rates and key findings are included in compliance reports.

This structured approach will ensure that participant feedback is systematically gathered, analyzed, and reported in alignment with DFPS contract requirements.

AllOne Health is committed to addressing these findings and ensuring compliance with DFPS requirements. We will continue to monitor our progress, conduct internal audits, and make improvements as necessary. A follow-up review will be conducted within six (6) months to confirm the effectiveness of these corrective actions.

### Responsible Manager

Executive Director

### Target Implementation Date

April 1, 2025

## Chapter 3: AllOne Health Did Not Report Some Required Information to DFPS

AllOne Health did not include 10 of the 14 (71.4 percent) required reporting categories in the two quarterly utilization reports it submitted to DFPS covering the audit scope. These 10 missing categories included information that would allow DFPS to assess:

- EAP service utilization by DFPS divisions, DFPS program areas, or geographic areas.
- Number of customer satisfaction surveys and response rates.
- Customer satisfaction survey responses, including comments.
- Frequency of short-term EAP services and referrals for long-term EAP services.
- EAP-service effectiveness.
- Complaints from DFPS participants about EAP services and complaint resolutions.
- Delays and cancellations DFPS participants experienced after requesting on-site EAP services.

Additionally, AllOne Health's subcontractor did not report EAP utilization information for DFPS locations where less than 100 participants received services.

AllOne Health's contract with DFPS specifies the 14 reporting categories it must include in its quarterly utilization reports to DFPS.<sup>14</sup> While AllOne Health is contractually required to submit quarterly utilization reports that include all 14 reporting categories, it asserted that DFPS's acceptance of prior utilization reports without all required information demonstrated that DFPS approved of the incomplete reports. As a result of AllOne Health excluding some required report categories, DFPS did not have necessary information to monitor AllOne Health or comprehensively measure the utilization and effectiveness of EAP services for DFPS participants.

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<sup>14</sup> DFPS Contract #HHS001365400001, Attachment A, § III.A (Apr. 1, 2024).

## Recommendation 3

AllOne Health should include all contractually required information in the quarterly utilization reports it submits to DFPS.

### Management Response

#### Action Plan

AllOne Health is committed to providing DFPS with meaningful program usage data through the provision of quarterly utilization reports. Our current reports include the following DFPS contractually required information:

1. *Demographics of Participants using EAP services to include Division or Program (i.e., Child Protective Services (CPS), Child Protective Investigations (CPI), Adult Protective Services (APS) and Statewide Intake (SWI)).*  
NOTE: This information will need to be self-disclosed by the participant during intake.
2. *Utilization rate for counseling and other EAP services.*
3. *Utilization rate for population by each DFPS division and city.*
4. *Utilization rate specific to Participant type (including whether employee, dependent, spouse, household member, full-time, part-time, or retiree) and case status.*
5. *Utilization rate per activity type and primary presenting issues.*
6. *Detailed summary of organizational services performed such as in-service trainings, seminars, and critical incident stress debriefings.*
7. *Number of surveys provided after completion of counseling and other services.*
8. *Response rate for surveys.*
9. *Measurement of the effectiveness of clinical services throughout a Participant's experience by evaluating the progress and effectiveness of counseling at key points in the process.*
10. *Participant survey responses, including comments. Include an executive summary of services used to include critical incident support services.*

11. *The number and types of complaints received by the Contractor and their resolutions.*

12. *The number and reasons of on-site visit delays and cancellations.*

The following items are not tracked for the following reasons:

1. *Percentage of short-term issues, by theme or issue, that receive six counseling sessions.*

AllOne Health authorizes all six (6) counseling sessions upfront for each DFPS EAP clinical case. However, attendance is solely at the discretion of the DFPS participant. Since participants are not required to report completed sessions, AllOne Health is unable to track the actual number of sessions attended.

2. *Percentage of issues, by theme or issue, that are referred for long-term counseling.*

AllOne Health does not track cases referred to long-term counseling, as the majority of participants are authorized EAP sessions rather than being referred directly to long-term resources. Since such referrals are infrequent, tracking this data is not part of standard reporting.

AllOne Health is committed to addressing these findings and ensuring compliance with DFPS requirements. We will continue to monitor our progress, conduct internal audits, and make improvements as necessary. A follow-up review will be conducted within six (6) months to confirm the effectiveness of these corrective actions.

### **Responsible Manager**

Executive Director

### **Target Implementation Date**

May 1, 2025

## Appendix A: Objective, Scope, and Criteria

### Objective and Scope

The audit objective was to determine whether AllOne Health complied with selected DFPS EAP contractual requirements.

The audit scope covered the period from April 1, 2024, through August 31, 2024.

### Criteria

To evaluate the information provided, OIG Audit used the DFPS Vendor Contract for employee assistance program services, Contract #HHS001365400001 (Apr. 1, 2024).

## Appendix B: Background

The current contract between DFPS and AllOne Health covers the period from April 1, 2024, through March 31, 2026, and allows three one-year extensions.

DFPS's prior contract with Deer Oaks EAP Services, LLC, covered the period from February 1, 2019, through January 31, 2020, and included four one-year extensions. To allow DFPS time to complete procurement for the current contract, Deer Oaks EAP Services, LLC—now AllOne Health—agreed to a contract extension that covered the period from February 1, 2024, through June 30, 2024.

Under all contracts, AllOne Health (a) provided quarterly and annual reports to DFPS using information from its subcontractor and (b) engaged its subcontractor to receive and respond to all DFPS requests for rapid response critical incident services.

## Appendix C: Detailed Methodology

OIG Audit issued an engagement letter to AllOne Health on November 25, 2024, providing information about the upcoming audit, and conducted fieldwork from December 2, 2024, through February 10, 2025.

OIG Audit also reviewed AllOne Health's system of internal controls, including components of internal control,<sup>15</sup> within the context of the audit objectives by:

- Interviewing AllOne Health and subcontractor staff with oversight responsibilities for rapid response critical incident services, including timeliness, counselor qualifications, surveys, and reporting.
- Reviewing relevant documentation, such as (a) subcontractor policies and procedures for responding to rapid response critical incident requests, (b) subcontractor policies and procedures for counselor credentialing and recredentialing, and (c) selected counselor training records.
- Performing selected tests of the relevant documentation.

### Data Reliability

To assess the reliability of AllOne Health's subcontractor's rapid response critical incident case listing, OIG Audit (a) viewed key data points live in the system AllOne Health's subcontractor used to generate the list, (b) compared prior-year case counts for the same period to the case counts for the audit scope, and (c) interviewed relevant subcontractor personnel knowledgeable about the systems and data. OIG Audit determined that the data was sufficiently reliable for the purpose of this audit.

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<sup>15</sup> For more information on the components of internal control, see the United States Government Accountability Office's *Standards for Internal Control in the Federal Government*, (Sept. 2014), <https://www.gao.gov/assets/gao-14-704g.pdf> (accessed Apr. 16, 2021).

## Testing Methodology

OIG Audit collected information for this audit through discussions, interviews, and electronic communications with staff from AllOne Health and its subcontractor. Specifically, OIG Audit reviewed:

- AllOne Health’s subcontractor’s population of event reports and associated initial call requests to assess subcontractor rapid response critical incident response timeliness.
- AllOne Health’s subcontractor’s case management system tracking to determine whether the subcontractor surveyed the DFPS point of contact who coordinated the population of rapid response critical incident response requests.
- The Texas HealthSelect website and AllOne Health’s subcontractor’s personnel files, training records, and applicable recredentialing records to assess the qualifications and training of counselors who responded to the population of rapid response critical incident requests.
- AllOne Health’s third quarter, fourth quarter, and annual reports<sup>16</sup> to (a) determine whether each report contained required information and (b) assess whether AllOne Health accurately reported the number of critical incident support debriefings.

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<sup>16</sup> AllOne Health provided cumulative reports, so its annual report for state fiscal year 2024 included the fourth quarter report.



## Appendix D: Summary of Recommendations

**Table D.1: Summary of Recommendations to AllOne Health**

No.	Recommendation
1	<p>AllOne Health should develop and implement policies and procedures to:</p> <ul style="list-style-type: none"> <li>A. Verify counselors meet licensing requirements.</li> <li>B. Maintain documentation of one-time counseling agreements and evidence it verified associated counselor licenses or certifications, education, and experience.</li> <li>C. Require counselors to complete required training and view required DFPS videos before providing counseling services.</li> <li>D. Respond to DFPS requests for rapid response critical incident services through counselors who participate in the state of Texas employee insurance network.</li> </ul>
2	AllOne Health should survey DFPS participants who receive rapid response critical incident services to obtain contractually required information.
3	AllOne Health should include all contractually required information in the quarterly utilization reports it submits to DFPS.

Source: OIG Audit

## Appendix E: Related Reports

- Benchmark Family Service, Inc.: A Former DFPS Contractor, [AUD-21-020](#), August 12, 2021
- Easter Seals Rio Grande Valley: A Texas DFPS Contractor, [AUD-20-005](#), February 26, 2020
- United Way of Metropolitan Dallas: A DFPS Contractor, [AUD-19-029](#), August 28, 2019
- Audit of DFPS Child-Specific Contracts, [AUD-19-020](#), July 15, 2019
- Audit of Passage of Youth Family Center: Child-Placing Agency Residential Child-Care Contract with the Texas Department of Family and Protective Services, [AUD-19-007](#), November 30, 2018
- Audit of Children’s Hope Residential Services, Inc.: Residential Child-Care Contracts with the Texas Department of Family and Protective Services, [AUD-18-007](#), November 30, 2017

## Appendix F: Resources for Additional Information

The following resources provide additional information about the topics covered in this report.

### For more information on Deer Oaks EAP Services, LLC:

Homepage, Deer Oaks, <https://www.deeroaks.com/> (accessed Sept. 24, 2024)

### For more information on AllOne Health Resources, Inc.:

Homepage, AllOne Health, <https://allonehealth.com/> (accessed December 12, 2024)

Employee Assistance Program, AllOne Health, <https://allonehealth.com/employee-assistance-program/> (accessed February 6, 2025)

### For more information on the Texas Department of Family and Protective Services:

Homepage, Texas Department of Family and Protective Services, <https://www.dfps.texas.gov/> (accessed December 16, 2024)

EAP Services for DFPS, <https://www.txdfpseap.com/> (accessed February 6, 2025)

## Appendix G: Report Team and Distribution

### Report Team

OIG staff members who contributed to this audit report include:

- Anton Dutchover, CPA, Deputy Inspector General of Audit and Inspections
- Patrick Smith, CIA, Audit Director
- Sarah Cason, CIA, CISA, Senior Managing Auditor
- Travis Campbell, Senior Auditor
- Aleah Mays-Williams, Senior Auditor
- Alex Allred, Associate Auditor
- Karen Mullen, CGAP, CIGA, Quality Assurance Reviewer
- Ashley Rains, CPE, CFE, Senior Audit Operations Analyst

### Report Distribution

#### Texas Health and Human Services Commission

- Cecile Erwin Young, Executive Commissioner
- Kate Hendrix, Chief of Staff
- Maurice McCreary, Jr., Chief Operating Officer
- Jordan Dixon, Chief Policy and Regulatory Officer
- Karen Ray, Chief Counsel
- Michelle Alletto, Chief Program and Services Officer
- Sylvia Hernandez Kauffman, Chief Information Officer
- Nicole Guerrero, Chief Audit Executive

## Department of Family and Protective Services

- Stephanie Muth, Commissioner
- Jennifer Sims, Deputy Commissioner of Operations
- Roberto Beaty, Chief Operating Officer
- Chance Watson, Chief Internal Audit Officer

## AllOne Health Resources, Inc.

- Bryan Levy, Regional Vice President EAP–West
- Alicia Barrera, Executive Director
- Carolyn Knowles, Senior Account Manager
- Olivia Jackson, Account Manager

## Appendix H: OIG Mission, Leadership, and Contact Information

The mission of OIG is to prevent, detect, and deter fraud, waste, and abuse through the audit, investigation, and inspection of federal and state taxpayer dollars used in the provision and delivery of health and human services in Texas. The senior leadership guiding the fulfillment of OIG's mission and statutory responsibility includes:

- Raymond Charles Winter, Inspector General
- Susan Biles, Principal Deputy Inspector General
- Kacy J. VerColen, Chief of Audit and Inspections
- Eugenia Krieg, Chief of Staff, Chief of Policy and Performance
- Erik Cary, Chief Counsel
- Diane Salisbury, Chief of Data Reviews
- Matt Chaplin, Chief of Operations
- Steve Johnson, Chief of Investigations and Utilization Reviews

### To Obtain Copies of OIG Reports

- OIG website: [ReportTexasFraud.com](http://ReportTexasFraud.com)

### To Report Fraud, Waste, and Abuse in Texas HHS Programs

- Online: <https://oig.hhs.texas.gov/report-fraud-waste-or-abuse>
- Phone: 1-800-436-6184

### To Contact OIG

- Email: [oig.generalinquiries@hhs.texas.gov](mailto:oig.generalinquiries@hhs.texas.gov)
- Mail: Texas Health and Human Services  
Office of Inspector General  
P.O. Box 85200  
Austin, Texas 78708-5200
- Phone: 512-491-2000