

Audit Report

El Paso City-County Nutrition Program

**A Texas Home-Delivered Meals
Program Provider**



**Inspector
General**

Texas Health
and Human Services

**October 28, 2021
OIG Report No. AUD-22-004**



HHS OIG

TEXAS HEALTH AND HUMAN
SERVICES
OFFICE OF
INSPECTOR GENERAL

October 28, 2021

Audit Report

EL PASO CITY-COUNTY NUTRITION PROGRAM

A Texas Home-Delivered Meals Program Provider

WHY OIG CONDUCTED THIS AUDIT

The Texas Health and Human Services (HHS) Office of Inspector General Audit and Inspections Division (OIG Audit) conducted an audit of the El Paso City-County Nutrition Program (El Paso County). During the audit scope, which covered the period from October 1, 2019, through December 31, 2020, the Texas Health and Human Services Commission (HHSC) paid El Paso County \$5.31 per meal, totaling \$2.3 million for 435,995 meals.

The audit objective was to determine if El Paso County provided and billed for services in compliance with selected requirements.

WHAT OIG RECOMMENDS

El Paso County should strengthen its processes and controls related to:

- Ensuring all participants receiving meals on an alternate delivery schedules under an HHSC-approved waiver receive at least three weekly contacts.
- Initiating home-delivered meal services to new participants within the required time frame.
- Notifying HHSC when it is not able to initiate services within the required time frame.
- Documentation and billing for undelivered meals.
- Notifying HHSC within the required time frame when a participant has undelivered meals on two consecutive service days or three nonconsecutive service days within a month.

Additionally, El Paso County should work with HHSC to determine if repayment is required for potential overbilling for home-delivered meal services.

MANAGEMENT RESPONSE

El Paso County agreed with the audit recommendations and indicated corrective actions would be fully implemented by April 2022.

For more information, contact:
OIGAuditReports@hhs.texas.gov

WHAT OIG FOUND

The El Paso City-County Nutrition Program (El Paso County) had processes in place and complied with certain selected requirements of the Home-Delivered Meals program administered by the Texas Health and Human Services Commission (HHSC). Specifically, El Paso County (a) implemented service changes as required, (b) resolved complaints timely, (c) ensured meals were prepared and stored at the appropriate temperatures, and (d) ensured menus were appropriately approved.

However, because auditors could not validate (a) El Paso County's unsuccessful delivery attempts and (b) the accuracy of El Paso County's billings for unsuccessful delivery attempts submitted to HHSC, the Texas Health and Human Services (HHS) Office of Inspector General Audit and Inspections Division (OIG Audit) could not determine if billing errors occurred.

Additionally, El Paso County did not always comply with certain requirements related to (a) communication with program participants, (b) initiation of home-delivered meal services, and (c) communication to HHSC for meals that could not be delivered. Specifically, El Paso County did not consistently:

- Perform the required contacts with participants on the HHSC-approved waiver.
- Initiate home-delivered meal services for new participants within the required ten-day time frame.
- Notify HHSC timely when services did not begin within ten calendar days for certain new participants.
- Communicate timely with HHSC regarding unsuccessful delivery attempts.

BACKGROUND

El Paso County operates as a Home-Delivered Meals program provider under a community services contract with HHSC. Payments for services under this contract were based on established per meal rates and were funded by Title XX of the Social Security Act.

For federal fiscal years 2020 and 2021, the contract budget for El Paso County was \$2.1 million per fiscal year.

TABLE OF CONTENTS

INTRODUCTION	1
AUDIT RESULTS	3
WAIVER REQUIREMENTS	4
<i>Issue 1: El Paso County Did Not Always Make the Required Contacts to Waiver Participants</i>	<i>4</i>
Recommendation 1.....	5
INITIATION OF HOME-DELIVERED MEAL SERVICES	6
<i>Issue 2: El Paso County Did Not Always Initiate Home- Delivered Meal Services to New Participants Timely.....</i>	<i>6</i>
Recommendation 2.....	7
UNSUCCESSFUL DELIVERY ATTEMPTS	8
<i>Issue 3: El Paso County Did Not Always Comply with Requirements for Unsuccessful Delivery Attempts.....</i>	<i>8</i>
Recommendation 3.....	10
CONCLUSION.....	12
APPENDICES	13
A: <i>Methodology, Data Reliability, Sampling, and Criteria</i>	<i>13</i>
B: <i>Report Team and Distribution</i>	<i>15</i>
C: <i>OIG Mission, Leadership, and Contact Information</i>	<i>16</i>

INTRODUCTION

The Texas Health and Human Services (HHS) Office of Inspector General Audit and Inspections Division (OIG Audit) conducted an audit of the El Paso City-County Nutrition Program (El Paso County), which is a department within the El Paso county government.¹ El Paso County operates as a Home-Delivered Meals program provider² under a community services contract with the Texas Health and Human Services Commission (HHSC).³ Payments for services under this contract were based on established per meal rates and were funded by Title XX of the Social Security Act.

For federal fiscal years 2020 and 2021,⁴ the contract budget for El Paso County was \$2.1 million per fiscal year.

During the audit scope, which covered the period from October 1, 2019, through December 31, 2020, El Paso County billed HHSC for 435,995 meals delivered to approximately 1,150 to 1,450 program participants each month. HHSC paid \$5.31 to El Paso County for each meal delivered, totaling \$2.3 million. Table 1 provides additional details about these amounts.

Table 1: Amount HHSC Paid to El Paso County

Period Covered	Amount per Meal	Meals Delivered	Total Paid to El Paso County
October 1, 2019, through September 30, 2020	\$5.31	348,486	\$1,850,460
October 1, 2020, through December 31, 2020	5.31	87,509	464,673
Total	—	435,995	\$2,315,133

Source: *OIG Audit, based on data provided by HHSC*

Home-Delivered Meals program providers are required to provide home-delivered meal services for a specific number of service days, with a minimum of five meals per week for all participants.⁵ For certain circumstances, providers may request approval of a waiver to deliver fewer than five times per week. Under an approved waiver, El Paso County delivered the authorized number of weekly meals to all participants one or two days per week. For federal fiscal years 2020 and 2021, the waiver on file at HHSC included an estimated 1,500 participants.

¹ In the context of this report, “El Paso County” refers only to the El Paso City-County Nutrition Program, which was the subject of the audit.

² A Home-Delivered Meals program provider delivers meals to eligible individuals in accordance with contractual and Texas Administrative Code requirements.

³ Texas Department of Human Services (now part of HHSC), “Contract for Community Care Programs,” Vendor #000173100 (Oct. 1, 2002), as amended.

⁴ Federal fiscal years cover the period from October 1 through September 30.

⁵ 40 Tex. Admin. Code § 55.5(c)(1) (Sep. 1, 2014).

Objective and Scope

The audit objective was to determine if El Paso County provided and billed for services in compliance with selected requirements.

The audit scope covered the period from October 1, 2019, through December 31, 2020. The audit included a review of El Paso County's system of internal controls as well as testing of controls that were significant within the context of the audit objective.

Management Responses

OIG Audit presented audit results, issues, and recommendations to El Paso County in a draft report dated October 8, 2021. El Paso County agreed with the audit recommendations and indicated corrective actions would be fully implemented by April 2022. El Paso County's management responses are included in the report following each recommendation.

While El Paso County's management responses stated that some corrective actions were implemented before the issuance of this report, the updated processes described in El Paso County's management responses are unaudited by OIG Audit.

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.

AUDIT RESULTS

El Paso County had processes in place and complied with certain selected requirements of the Home-Delivered Meals program administered by HHSC. Specifically, El Paso County:

- Implemented changes to the number of meals delivered within the required time frame.
- Resolved complaints in a timely manner.
- Monitored and documented food temperatures within the required ranges for hot and frozen meals.
- Ensured menus were approved by a credentialed dietician.

However, because auditors could not validate (a) El Paso County's unsuccessful delivery attempts and (b) the accuracy of El Paso County's billings for unsuccessful delivery attempts submitted to HHSC, OIG Audit could not determine if billing errors occurred.

Additionally, El Paso County did not always comply with certain requirements related to (a) communication with program participants, (b) initiation of home-delivered meal services, and (c) communication to HHSC for meals that could not be delivered. Specifically, El Paso County did not consistently:

- Perform the required contacts with participants on the HHSC-approved waiver.
- Initiate home-delivered meal services for new participants within the required ten-day time frame.
- Notify HHSC timely when services did not begin within ten calendar days for certain new participants.
- Communicate timely with HHSC regarding unsuccessful delivery attempts.

OIG Audit communicated other, less significant issues to El Paso County in a separate written communication.

WAIVER REQUIREMENTS

Home-Delivered Meals program providers may request a waiver from HHSC to deliver fewer than five times per week for certain circumstances.⁶ Participants covered under a waiver who receive fewer deliveries per week, as approved, are still required to receive a minimum of three contacts per week, including the days of the meal deliveries.⁷

Issue 1: El Paso County Did Not Always Make the Required Contacts to Waiver Participants

El Paso County did not consistently meet the minimum requirement for contacts with participants.

El Paso County's model consisted of one or two meal deliveries to all participants each week, regardless of the number of weekly meals HHSC authorized participants to receive. El Paso County's approved waiver included alternative delivery schedules for an estimated 1,500 participants, which covered all of El Paso County's participants throughout the audit scope period. The waiver requires three contacts per week to participants, which may include meal deliveries. However, if deliveries do not occur three times per week, El Paso County is required to contact participants separately to comply with the minimum communication requirement.

El Paso County was unaware of the requirement to have contact with participants at least three times per week, and it did not contact participants consistently. Occasionally, participants may have received three contacts per week if they received two deliveries in a particular week and also received an additional call for other reasons. However, El Paso County did not maintain a record of contact with participants; therefore, auditors could not perform testing of the three contacts per week for participants.

When the three required contacts per week were not performed, each participant's well-being was not assessed by El Paso County three times per week in accordance with the applicable communication requirements.

⁶ A waiver allows Home-Delivered Meals program providers to deliver frozen or shelf-stable meals on a reduced delivery schedule if they are unable to deliver five days per week.

⁷ Texas Health and Human Services, Home-Delivered Meals Provider Manual, § 4310 (Sept. 3, 2013).

Recommendation 1

El Paso County should develop and implement a process to ensure all participants served by an alternate delivery schedule under an HHSC-approved waiver receive at least three contacts per week as required.

Management Response

Action Plan

The actions that have been or will be taken to implement the recommendation:

The El Paso County has engaged the Texas A&M Colonias Program – Community Health Workers (AKA Promotoras) to assist with the 3rd weekly contact, per week to home delivered meal participants. The other two contacts per week are conducted during the weekly meal delivery, as approved in the Waiver FY22.

The partnership between the El Paso County and Texas A&M Colonias Program is a Volunteer Initiative that also helps achieve a training requirement every Community Health Worker must complete upon accepting employment with Texas A&M Colonias Program. Likely, it helps the El Paso County be in compliance with the 3rd weekly contact requirement because they have committed 10 Community Health Workers to assist our office with making the 3rd weekly contact call. Each Community Health Worker that accepted the volunteer assignment has cleared all the pre-employment/volunteer reference and background check requirements for the Texas A&M Colonias Program and the El Paso County's Human Resources Office. The nutrition program Accounting Specialist has also conducted the mandatory NAR (Nurse Aide Registry) background check as required by HHSC before assignment. Once all clearance was obtained, the "call lists" were provided to each of the 10 Workers. While this volunteer initiative is being implemented, the nutrition program is also in the process of purchasing an industry standard software program, ServTracker Software Solutions. This software program is designed to be effective and efficient and can eliminate several duplicate billing efforts that often result when relying on the library of excel spreadsheets currently used. We are hopeful that the purchase and implementation of this software program will free up the program data entry staff from time spent on numerous billing activities and instead can help with the 3rd weekly contact calls. This will enhance the effort and will ensure we stay in compliance with the Waiver requirements.

Responsible Manager

Program Manager of Nutrition Program

Target Implementation Date

The target date to initiate the 3rd Weekly Contact action plan by the Texas A&M Community Health Workers is October 25, 2021.

The target date for finalizing purchase of software program, December 20, 2021.

The target date for conversion of new software program into the nutrition program, April 1, 2022.

INITIATION OF HOME-DELIVERED MEAL SERVICES

Home-Delivered Meals program providers are required to make the first meal delivery to new participants within ten calendar days from the effective date of the HHSC referral. If a provider is unable to begin services within the ten-day period, it must notify HHSC by the eleventh calendar day or the first working day after the eleventh calendar day.⁸

Issue 2: El Paso County Did Not Always Initiate Home-Delivered Meal Services to New Participants Timely

For 2 of 30 (7 percent) new program participants tested, El Paso County did not initiate home-delivered meal services within the required time frame or notify HHSC timely that services did not begin within ten calendar days. El Paso County delivered the first meal to two new program participants 16 to 17 days after the required time frame, and it did not notify HHSC timely of those delays.

El Paso County did not have adequate controls in place to (a) ensure that the delivery of meals to new program participants was initiated timely or (b) notify HHSC within the required time frame of participants for whom it could not begin services before the initiation deadline. Additionally, El Paso County only delivers meals two days per week, which increases the risk that the first delivery will not occur by the tenth day from the effective date provided by HHSC. For example, depending on the day of the week in which the initiation process was finalized and El Paso County was ready to begin delivering meals, new program participants may have waited up to five days for the next delivery date to occur to provide the first meals.

By not following time frame requirements for both initiating home-delivered meal services and notifying HHSC that services were not initiated, El Paso County increased the risk of participants not receiving necessary nutritional meals promptly.

⁸ 40 Tex. Admin. Code § 55.25 (Mar. 1, 2004).

Recommendation 2

El Paso County should strengthen its processes and controls to ensure it:

- Initiates home-delivered meal services to newly assigned participants within the required time frame.
- Notifies HHSC if it is not able to initiate services within the required time frame.

Management Response

Action Plan

The actions that have been or will be taken to implement the recommendation:

*This issue was communicated to the nutrition program Accounting Specialist, Sr. during the audit. The staff did not wait long to begin implementing a remedy to this issue and proceeded to create, implement and maintain a **New Client & Re-Assessment Log** which tracks all new client information and is a check and balance to ensure meal services begin within the required 10 days after receiving referral. The log will track the following:*

- a. Date referral was faxed to our office.*
- b. Date new client assigned to an Eligibility Officer for home visit/call.*
- c. Date Eligibility Officer completes Home Visit.*
- d. Date when meal delivery service initiates.*
- e. Date(s) Eligibility Officer attempts home visit but is unsuccessful; policy indicates up to 3 attempts will be made.*
- f. For each failed attempt, a 2067 is completed and faxed to the local HHS Community Cares Program Office. Each time a 2067 is completed, it is also tracked in this spreadsheet.*

The implementation of this new log has proven effective in correcting the issue.

Please note a separate spreadsheet is maintained with all client information of 3 failed attempts which indicates our office will wait on the HHS Caseworker to notify us of termination of services or request to resume attempts to contact client with new contact information.

Responsible Manager

Program Manager of Nutrition Program

Target Implementation Date

The implementation date was Aug. 1, 2021

UNSUCCESSFUL DELIVERY ATTEMPTS

When unsuccessful attempts to deliver meals to participants occur, Home-Delivered Meals program providers may be reimbursed for up to two failed deliveries per participant per month if (a) a meal delivery is attempted, (b) the participant or responsible party is not home to accept the delivery, and (c) the participant's services were not suspended or terminated on the dates of the failed deliveries.⁹

Home-Delivered Meals program providers must document each applicable meal as undelivered and include the reason the meal could not be delivered. Additionally, when there are unsuccessful delivery attempts for either two consecutive service days or three nonconsecutive service days within a month, Home-Delivered Meals program providers must notify HHSC within one working day after the last missed delivery.¹⁰

Issue 3: El Paso County Did Not Always Comply with Requirements for Unsuccessful Delivery Attempts

El Paso County did not (a) have a reliable method for documenting undelivered meals and the associated billing to HHSC or (b) notify HHSC within the required time frame when there were unsuccessful delivery attempts on two consecutive service days or three nonconsecutive service days within a month.

Documentation and Billing for Unsuccessful Delivery Attempts

El Paso County had a process in place to record unsuccessful delivery attempts in a spreadsheet when notified by the delivery driver. Those entries were used to trigger certain activities, such as contacting HHSC and the relevant participants, preparing billings to HHSC, and notifying delivery drivers of any necessary schedule adjustments.

⁹ 40 Tex. Admin. Code § 55.41(c) (June 12, 2014).

¹⁰ 40 Tex. Admin. Code § 55.27 (June 12, 2014).

One of the four months of daily spreadsheets selected for testing contained errors. As a result of those errors, the selected month's billing to HHSC could not be reconciled. El Paso County asserted that the spreadsheet was accessible to multiple employees and was easily edited and saved with no ability to access previous versions. Additionally, El Paso County asserted that similar errors were previously identified in other monthly spreadsheets used to record unsuccessful delivery attempts and that staff members were unable to correct the errors. Auditors were unable to determine whether the other three spreadsheets selected for testing contained errors; therefore, OIG Audit could not determine if the complete populations of delivered and undelivered meals were identified.

El Paso County prepares invoices and bills HHSC weekly for home-delivered meal services, which may mitigate the risk of significant billing errors. However, because El Paso County uses the information in the spreadsheets to bill HHSC, OIG Audit could not determine if billing errors occurred.

Notification of Unsuccessful Delivery Attempts

For 15 of the 20 (75 percent) applicable participants tested, El Paso County could not provide support to demonstrate that HHSC was notified timely when there were unsuccessful delivery attempts on two consecutive service days or three nonconsecutive service days within a month. For those 15 participants, HHSC was notified of the unsuccessful delivery one to 25 days after the required time frame.¹¹ El Paso County did not have a process in place to ensure the notification to HHSC occurred within one working day of the unsuccessful delivery.

Notification of two consecutive unsuccessful delivery attempts or three unsuccessful delivery attempts within a month allows HHSC to determine the need to assess the participant's situation and continued need for home-delivered meals. Delayed notification of unsuccessful delivery attempts may prevent HHSC from appropriately assessing and making needed adjustments to approved home-delivered meal services.

¹¹ OIG Audit relied on the best available data and validated that data to the greatest extent possible to complete testing.

Recommendation 3

El Paso County should:

- Strengthen its processes to ensure undelivered meals are appropriately tracked, supported, and billed to HHSC.
- Develop and implement a process to ensure that HHSC is notified within the required time frame when there are two consecutive unsuccessful delivery attempts or three unsuccessful delivery attempts within a month for a participant.
- Work with HHSC to determine if repayment is required as a result of potential overbilling for home-delivered meal services.

Management Response

Action Plan

The actions that have been or will be taken to implement the recommendation:

This issue was communicated to the nutrition program Accounting Specialist, Sr. during the audit. The nutrition program staff was not always communicating to HHS when a second unsuccessful delivery attempt occurred. As soon as the OIG team verbally notified us, a change was implemented to include the following:

- a. *The **Return Log** is no longer updated by any nutrition staff member receiving the call from the driver to inform of an unsuccessful meal delivery attempt.*
- b. *The staff receiving the call from the meal delivery driver to notify of the unsuccessful meal delivery attempt sends the Accounting Specialist, Sr. an email notification indicating client's name/funder/the time and date of the unsuccessful meal delivery attempt call.*
- c. *Upon receiving the email notification, the Accounting Specialist updates the Return Log accordingly and is the only staff with access to the Return Log for updates to the log.*
- d. *Upon notification of an undeliverable meal, the Accounting Specialist sends HHS local office a 2067 to communicate to them the undeliverable meal attempt. All undeliverable meal attempts, first or second attempts, are communicated to the HHS office by submitting a 2067 every time a meal is undeliverable. The Return Log also reflects the date(s) the 2067s were sent to the HHS local office, via fax.*

- e. *A weekly comparison of return log to the billing spreadsheet will be the final step to ensuring there are no overbilling discrepancies for undeliverable meals.*
1. *If discrepancy is identified, units will be updated weekly to ensure timely and accurate portal submission to HHSC.*
 2. *If potential overbilling is identified, email communication with HHSC Contract Specialist will reflect revisions from billing report and TMHP portal will be updated to return funds that were overbilled*

Responsible Manager

Program Manager of Nutrition Program

Target Implementation Date

The implementation date was June 28, 2021

CONCLUSION

El Paso County had processes in place and complied with certain selected requirements of the Home-Delivered Meals program administered by HHSC. Specifically, El Paso County (a) implemented service changes as required, (b) resolved complaints timely, (c) ensured meals were prepared and stored at the appropriate temperatures, and (d) ensured menus were appropriately approved.

However, OIG Audit could not determine if billing errors occurred as a result of weaknesses in the spreadsheet El Paso County used to submit billing to HHSC. Additionally, El Paso County did not always comply with certain requirements related to (a) communication with program participants, (b) initiation of home-delivered meal services, and (c) communication to HHSC for meals that could not be delivered.

OIG Audit offered recommendations to El Paso County which, if implemented, will help ensure compliance with all applicable requirements.

OIG Audit thanks management and staff at El Paso County for their cooperation and assistance during this audit.

Appendix A: Methodology, Data Reliability, Sampling, and Criteria

Methodology

OIG Audit issued an engagement letter to El Paso County on May 25, 2021, to provide information about the audit and conducted fieldwork from May 27, 2021, through August 13, 2021.

To accomplish the audit objective, auditors conducted interviews with El Paso County management and staff and reviewed:

- The contract between HHSC and El Paso County.
- El Paso County policies and procedures related to delivery and billing of home-delivered meals, participant communication, meal temperature requirements, and development and approval of menus.
- El Paso County's system of internal controls, including components of internal control,¹² significant within the context of the audit objective.
- Supporting documentation, including but not limited to, delivery and billing reports, complaint logs, home-delivered meal menus, and temperature logs.

Data Reliability

To assess the reliability of data related to active participants, meal deliveries to homes, paid home-delivered meal services, unsuccessful delivery attempts, and participant complaints, auditors (a) analyzed the data sets and query language for reasonableness and completeness, (b) reviewed existing information about the data and compared it to outside sources, and (c) interviewed HHSC and El Paso County staff who were knowledgeable about the data. OIG Audit made the following determinations regarding the reliability of the data sets:

- The populations of participants assigned to El Paso County and paid meals during the scope period that were obtained from HHSC were sufficiently reliable for the purposes of this audit.
- The population of complaints received by El Paso County during the scope period was sufficiently reliable for the purposes of this audit.

¹² 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).

- OIG Audit was unable to determine the reliability of the population of home-delivered meals service changes during the audit scope; however, the data provided was the best source of data available for the purposes of this audit.
- As discussed in Issue 3, OIG Audit was unable to determine if the complete populations of home-delivered meals deliveries and unsuccessful delivery attempts were identified; however, the data provided was the best source of data available for the purposes of this audit.

Sampling Methodology

Auditors selected nonstatistical samples, primarily through random and risk-based selections, related to (a) the initiation of home-delivered meal services, (b) the delivery and billing of home-delivered meals, (c) home-delivered meals that were undeliverable, (d) temperature logs, and (e) home-delivered meal menus. The sample items were generally not representative of the populations; therefore, it would not be appropriate to project the test results to the populations.

Auditors did not use a sampling methodology for testing changes to home-delivered meal services and participant complaint resolution; instead, auditors performed selected testing on the complete populations identified. Therefore, auditors did not need to project testing results to the populations.

Criteria

OIG Audit used the following criteria to evaluate the information provided:

- 40 Tex. Admin. Code §§ 49 (2018) and 55 (2004 through 2014)
- Texas Department of Human Services (now part of HHSC), “Contract for Community Care Programs,” Vendor #000173100 (2002), as amended
- Texas Health and Human Services, Home-Delivered Meals Provider Manual, § 4310 (2013)

Appendix B: Report Team and Distribution

Report Team

OIG staff members who contributed to this audit report include:

- Kacy J. VerColen, CPA, Deputy Inspector General of Audit and Inspections
- Tammie Wells, CIA, CFE, Audit Director
- Amy Adler, CPA, CFE, Audit Director
- Kenneth Johnson, CPA, CIA, CISA, Audit Project Manager
- Summer Grubb, CGAP, Senior Auditor
- Erin Powell, Quality Assurance Reviewer
- Patrick Smith, CIA, CRMA, Quality Assurance Reviewer
- Ashley Rains, CFE, Senior Audit Operations Analyst

Report Distribution

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- Cecile Erwin Young, Executive Commissioner
- Kate Hendrix, Chief of Staff
- Maurice McCreary, Jr., Chief Operating Officer
- Victoria Ford, Chief Policy and Regulatory Officer
- Karen Ray, Chief Counsel
- Michelle Alletto, Chief Program and Services Officer
- Nicole Guerrero, Director of Internal Audit
- Wayne Salter, Deputy Executive Commissioner, Access and Eligibility Services

El Paso City-County Nutrition Program

- Betsy C. Keller, County Chief Administrator
- Irene G. Valenzuela, Executive Director of Community Services
- Rosalva Hernandez, Program Manager of Nutrition Program

Appendix C: 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:

- Sylvia Hernandez Kauffman, Inspector General
- Audrey O’Neill, Principal Deputy Inspector General, Chief of Audit and Inspections
- Susan Biles, Chief of Staff, Chief of Policy and Performance
- Dirk Johnson, Chief Counsel
- Christine Maldonado, Chief of Operations and Workforce Leadership
- Steve Johnson, Chief of Investigations and Reviews

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