May 15, 2014

Honorable Ray West Brown County Judge Brown County Courthouse 200 S. Broadway Brownwood, TX. 76801

RE: Indigent Health Care Program Assessment

Dear Judge West:

On May 13, 2014 per the request of T'anna McClure, I, Anita I. Dunlap conducted an 'In-Person' assessment of the Brown County Indigent Health Care Program. The following are the findings of the assessment.

ASSESMENT FINDINGS

The Brown County Indigent Health Care Program Manuals were found to be outdated; last revision located was early 2013.

Brown County Indigent Health Care has not reported monthly/annual expenditures to the Department of State Health Services (DSHS) since 2013. County governments are required to report expenditures for a consecutive twelve months before being eligible for state-assistance.

Brown County Indigent Health Care case files have not been re-evaluated for eligibility, in some cases, in 2 years or more. It is ascertained that Brown County Indigent Health Care is providing medical financial assistance to ineligible clients.

The Brown County Indigent Health Care Voucher System being used as an *eligibility determiner* is inadequate to determine Indigent Health Care eligibility according to eligibility application process found in the Texas Health and Safety Code, Title 2. Health, Subtitle C. Indigent Health Care, Chapter 61. Indigent Health Care and Treatment Act. Brown County eligibility process is not consistent.

Supplemental Security Income (SSI) applicants and appellants healthcare billings are not being processed for SSI reimbursements for a minimum of 2 years, nor processed for payment if denied benefits.

Brown County Indigent Health Care eligible client base is unknown due to unprocessed cases and inaccurate database recordation.

Brown County Indigent Health Care does not have a central filing system. Indigent Health Care case files are separated, filed or piled in several places throughout the office, leading to incomplete client files. Brown County Indigent Health Care does not adhere to

May 19, 2014 (Exhibit #6) a retention schedule, thus resulting in an abundance of outdated retention of case files and/or paperwork.

Brown County Indigent Health Care does not utilize the screening tools suggested by DSHS to help identify potentially eligible clientele for Medicaid and other programs provided by Texas state agencies (i.e. Your Texas Benefits and the Benefit Eligibility Screening Tool [BEST]).

Brown County Indigent Health Care denial form is noted to be stricter in policy regarding the appeal process than the Texas Health and Safety Code, Title 2. Health, Subtitle C. Indigent Health Care, Chapter 61. Indigent Health Care and Treatment Act, denial appeal provisions.

Brown County Indigent Health Care does not utilize DSHS provided forms.

Brown County Indigent Health Care cases are pending eligibility decisions for more than 14 days; pending eligibility was noted to take several weeks to months without rendering an eligibility decision. According to the Texas Health and Safety Code, Title 2. Health, Subtitle C. Indigent Health Care, Chapter 61. Indigent Health Care and Treatment Act cases undetermined past 14 days of receipt of a completed case are automatically determined eligible under the county administered program, thus resulting in an inflated case load due to lack of eligibility determination.

Brown County Indigent Health Care is utilizing the improper payment method for the Federally Qualified Health Center (FQHC) – Cross Timbers Health Clinics and the Rural Health Clinic – Regional Employee Assistance Program, Inc. (REAP) resulting in overpayment and underpayment for services rendered.

RECOMMENDATIONS

It is my recommendation that all above areas be addressed, clarified, corrected, and/or ceased and thorough training be conducted pertaining to the Texas Health and Safety Code, Title 2. Health, Subtitle C. Indigent Health Care, Chapter 61. Indigent Health Care and Treatment Act.

In addition, it is my recommendation the software being utilized to administer the Brown County Indigent Health Care Program be updated. It is a personal recommendation the Brown County Commissioner's Court consider the purchase and implementation of the Indigent Healthcare Solutions (IHS) software. I have experience utilizing the IHS software for the administration of county indigent programs and have found it all-inclusive, dependable, and necessary to keep up with the demand of the ever-changing Indigent Health Care Program and medical financial needs of clientele.

I propose to the Brown County Commissioner's Court, on an independent contract basis, I be approved the ability to assist Brown County Indigent Health Care rectify assessment findings and areas of concern to the county, and provide complete training encompassing the Texas Health and Safety Code, Title 2. Health, Subtitle C. Indigent Health Care, Chapter 61. Indigent

Health Care and Treatment Act. The proposed assistance will be completed by a specialized team of 3 individuals, proposed completion in the time-frame of approximately 10 days (or less), at a cost of \$1,500.00 per day (payment due upon completion). Continued telephonic support will be made available, at no charge, to Brown County Indigent Health Care after completion.

Enclosed is a proposed Brown County Schedule Planner outlining the provisions of Brown County Indigent Health Care rehabilitation. Please advise if further information is required or needed. You may contact me by telephoning (325)234-3853 or by e-mail anitadunlap@yahoo.com. Thank you in advance for the opportunity to serve your counties best interest. Sincerely,

anita 7. Dunlap

Anita I. Dunlap Independent Contractor Indigent / Inmate Medical Management Services

Cc: Gary Worley
Joel Kelton
Wayne Shaw
Larry Traweek
Nina Cox
T'anna McClure