

OFFICE OF THE INSPECTOR GENERAL CITY OF BALTIMORE



**Isabel Mercedes Cumming
Inspector General**

Investigative Report Synopsis

OIG Case # 20-0021-I

Issued: September 8, 2021



OFFICE OF THE INSPECTOR GENERAL
Isabel Mercedes Cumming, Inspector General
City Hall, Suite 635
100 N. Holliday Street
Baltimore, MD 21202



September 8, 2021

Dear Citizens of Baltimore City,

The Office of the Inspector General (OIG) received several complaints between August 2019 and May 2021 regarding the Baltimore City Health Department's (BCHD) operation of its Sexual Health Clinics (SHCs). Although the OIG investigated five separate allegations, this public synopsis will outline only one, related to medication inventory; another issue was referred to another entity for further investigation and the other three were related to personnel matters. The complete and final report of investigation was forwarded to the appropriate management entities for action and response to all matters.

As part of its investigation, the OIG conducted a site visit to the SHCs in December 2020 and interviewed on-site employees, including BCHD management. Additionally, the OIG reviewed BCHD internal policies, medication inventory, and inventory standard operation procedures.

SHC Inventory Concerns

The OIG was informed of ongoing concerns with medication inventory at the SHCs, including the removal of medication without proper documentation. Furthermore, witnesses informed the OIG of potential operational issues with medication storage systems that could lead to inaccurate inventory totals and medication disposal, potentially resulting in waste.

BCHD management acknowledged that there have been inventory management issues for years, including a lack of inventory record-keeping as far back as August 2016. According to BCHD, it hired a Bureau Administrator in the fall of 2017 to assist with creating and implementing an inventory control program, which has been rolled out over the past two-and-a-half years.¹

Several witnesses reported that employees assigned to the SHCs' Healthcare on the Spot (the Spot)² team disregarded BCHD inventory control protocols by failing to document medication removal. According to SHC management, they do not supervise the Spot team and were unable to track the Spot's medication distribution because the team was not completing regular inventory reports.³ SHC management have now started to implement monthly inventory reports. A draft policy from March 2020 would require the Spot team to document medication removal from the Eastern SHC medication storage device, an automated dispensing system. The OIG observed such a form during its site visit to the Eastern SHC.

¹ This statement was as of December 2020. BCHD management stated there had been a six-month delay in implementing the program due to the Eastern SHC's relocation.

² The Spot is a mobile health clinic that provides outreach healthcare services.

³ A Medical Director and Deputy Medical Director supervise the Spot team; both report to the BCHD Clinic Assistant Commissioner.

REPORT FRAUD, WASTE AND ABUSE

HOTLINE: 443-984-3476/800-417-0430 EMAIL: OIG@BALTIMORECITY.GOV WEBSITE: OIG.BALTIMORECITY.GOV

This public synopsis is only a summary of a more comprehensive report of investigation submitted to the appropriate City management official

The OIG learned the medication storage device itself may contribute to some inventory issues because it relies heavily upon data entry by employees. Although the device contains software that records the disbursement of medication, the device is not under video surveillance and the recorded information is only retained for one month. SHCs' management acknowledges the possibility for human error, which could potentially lead to an inaccurate count, and is working towards remedying those concerns.

INVESTIGATIVE FINDINGS

The OIG concluded there were problems with the SHCs' medication inventory process, including a lack of accurate medication counts, a lack of appropriate medication storage practices, and insufficient documentation of inventory policies and procedures. BCHD management is aware of these inventory process deficiencies and is actively working on addressing them by implementing a new inventory control process and communicating expectations to staff.

Sincerely,

A handwritten signature in cursive script that reads "Isabel Mercedes Cumming". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Isabel Mercedes Cumming, Inspector General
Office of the Inspector General

cc: Hon. Brandon Scott, Mayor of Baltimore City
Hon. Nick Mosby, Baltimore City Council President
Hon. Bill Henry, Baltimore City Comptroller
Honorable Members of the Baltimore City Council
Hon. Jim Shea, Baltimore City Solicitor

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**Baltimore City Health
Department Response
(redacted)**

Case # 20-0021-I



Baltimore City Health Department
1001 E. Fayette Street • Baltimore, Maryland 21202
Brandon M. Scott, Mayor
Letitia Dzirasa, M.D., Commissioner of Health

TO: Isabel Mercedes Cumming, Inspector General

FROM: Letitia Dzirasa, M.D., Commissioner of Health

LD

CC:

SUBJECT: OIG Case #20-002-I

DATE: August 13, 2021

This memo is written in response to the findings of the Office of the Inspector General (OIG) Case #20-0200-I that examined several allegations of mismanagement with the BCHD Sexual Health Clinics. Below are agency responses to each investigative finding.

Regarding the allegation of inventory issues in the Sexual Health Clinics, the agency has developed procedures and internal controls to address the issues and has been actively working on improving clinic inventory processes. Written protocols have been developed and implemented as shown in Exhibits 8 and 9. All Sexual Health Clinic supplies have been inventoried so that they can be managed appropriately and to improve procurement and restocking workflows. As noted in your report, the clinics' Pyxis machines are outdated and require a manual count of medication. The agency is actively working to purchase updated Pyxis machines as part of our transition to a new electronic medical record. We anticipate purchasing new machines by the end of fiscal year 2022. Additionally, as noted in your report, the current Pyxis machines are not under camera surveillance. We will work to implement your recommendation to install security cameras to address discrepancies that may arise.