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COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

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AUG 2 1971



Dear Mr. Downing:

Your letter of September 17, 1970, requested that we comment on questions raised by one of your constituents concerning the use of Federal funds for bringing 5-year-old Mississippi children to Washington, D.C., for dental treatment. Specifically, he asked:

- Whether the parents of the children had requested dental care from local, State, or Federal agencies.
- Who had determined that the dental care was necessary?
- Whether proper treatment could have been provided in Mississippi or some nearby State.
- Whether it was the most economical and cost-effective action to bring the children to Washington for treatment at a cost of \$250 a child.

Your constituent also suggested that we conduct studies of the propriety and efficiency of expenditures by the Department of Health, Education, and Welfare (HEW) and by other ²² agencies involved in socially oriented programs.

We have reviewed available documentation at HEW headquarters, Washington; the HEW regional office in Atlanta, Georgia; Howard University, Washington, where the children were treated; and the Delta-Hills Educational Association, Inc., Sardis, Mississippi--the organization responsible for operating the Head Start project under which funds were made available for the dental care. We discussed the conduct of the project with officials at each of these locations and the Mississippi State laws for the licensing of out-of-state doctors and dentists with officials of the Mississippi State Boards of Medical and Dental Examiners.

In brief, our review has shown that the Association is having difficulty providing the preschool children participating in the Head Start project with the necessary medical

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and dental care. The Association cited a number of reasons for this situation, including a lack of funds, a shortage of doctors and dentists in the area, and difficulties in ensuring that services would be provided locally in accordance with the nondiscriminatory requirements of the Civil Rights Act of 1964.

For these reasons the Association entered into agreements with Howard University--which is developing a comprehensive health project in Quitman County, Mississippi--to provide the medical and dental services. Howard University dental personnel, however, were unable to readily obtain licenses to practice in Mississippi, which prevented their providing the services in Mississippi. The licensing problem was the primary reason for transporting the Mississippi children to Washington for dental treatment.

Following is a brief history of the Mississippi Head Start project and comments on the specific questions raised by your constituent.

PROJECT HISTORY AND
HEAD START REQUIREMENTS

2 The project under which the Mississippi children were provided dental care was funded by an OEO grant under the Head Start program authorized by the Economic Opportunity Act of 1964, as amended. 957

3 The OEO grant, effective July 1, 1969, was awarded in the amount of \$1,049,953 to the Mississippi Industrial College, Holly Springs, Mississippi, to establish and operate--through its delegate agency, the Delta Hills Educational Association--a Head Start project for 1,060 preschool children in the five counties of Grenada, Panola, Quitman, Tallahatchie, and Tunica, Mississippi. The project grant provided for the development of a comprehensive health services program for the program participants. 1996

This program is designed to assist economically disadvantaged preschool children to achieve their full potential and provides for grants to public and private nonprofit agencies to establish and operate comprehensive projects for child development, encompassing programs for health, nutritional, educational, psychological, and social services. The program was administered by the Office of Economic Opportunity until July 1, 1969, when administrative responsibility for the program was transferred to HEW.

HEW's manual of policy instructions for the Head Start program requires that each Head Start project provide, or arrange for, comprehensive health services--including medical and dental examinations, treatment, and preventive measures--for all participating children. The manual also provides that, in developing a health services program, a grantee utilize other health programs, services, and resources already available in the community and limit the use of project funds to supplement, if necessary, the existing local health resources.

WHO DETERMINED THAT DENTAL CARE WAS NEEDED

Because HEW requires that a Head Start project provide, or arrange for, dental examinations and treatment for children participating in the project, such services are provided routinely. The transportation of 290 children to Washington for dental treatment was specifically approved by the parents of the children. The determination of need or extent of treatment was a medical decision based on the examinations given by Howard University personnel in Mississippi.

EFFORTS TO OBTAIN SERVICES LOCALLY

The grantee, in its application for a grant for the Head Start program, proposed to obtain the medical and dental services through arrangements with local physicians and dentists. In December 1969, however, the Association--the grantee's delegate agency--entered into an agreement with Howard

University to provide the required health services at a cost of \$47,543 during the first year of operation of the project. The agreement provided for the health services to be provided in Mississippi by the university's medical and dental personnel using mobile health equipment. As previously pointed out, Howard University is in the process of developing a comprehensive health services project in Quitman County.

The Association, in its request to Howard University for assistance, stated that the needed medical and dental services could not be provided satisfactorily by local physicians and dentists, because there was no assurance that the services would be provided in compliance with the nondiscriminatory provisions of the Civil Rights Act of 1964. Also the agreement with Howard University stated that the shortage of physicians and dentists in the project area contributed heavily to the problem of obtaining health services for the children. In its request the Association also stated that it considered its limited budget to be insufficient to finance the cost of the needed services through use of local practitioners and requested Howard University to furnish the services within the budgeted funds (\$47,543) available.

We found, however, that only limited efforts had been made by the Association to obtain the services locally. The director of the Association informed us that the Association had sent letters to local doctors and dentists listed in the telephone directory, inquiring whether they would furnish services in compliance with the Civil Rights Act, but had received few replies. The director, however, did not produce any evidence indicating how many local doctors and dentists had been contacted or that they had been requested to submit data on charges and on the number of children that they would treat.

In our opinion, such information was necessary to determine definitely whether medical and dental services could be obtained locally at a reasonable cost. The director informed us that comprehensive efforts had not been made to obtain the

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services from other than Howard University because he felt that the arrangement with the university would be extremely advantageous to the Association since the university was in the process of establishing a comprehensive health services project in Quitman County.

WHY THE SERVICES WERE PROVIDED IN WASHINGTON

According to the terms of the Association's agreement with Howard University, the health services to be provided by the university in Mississippi included comprehensive medical and dental examinations, screening and testing, and necessary follow-up treatment consistent with the limitations imposed by the mobile facilities available and by the severity of the medical services needed.

Late in 1969 Howard University personnel went to Mississippi and performed examinations and screening services for approximately 1,000 program participants. Because Mississippi State law did not permit out-of-state dentists to practice in the State for extended periods without becoming licensed, however, Howard University officials decided to bring the children to the university in Washington for the required dental treatment.

Since the licensing problem was the major factor in Howard University's decision to bring the children to Washington, we talked to university officials about the measures taken to obtain licenses to practice in the State. They informed us that the problems with State laws had not been anticipated before entering into the agreement with the Association, because they had been told by a representative of the University of Mississippi that he could arrange for them to perform the needed medical and dental services. They added, however, that this arrangement had not materialized because this individual had left the University of Mississippi. Apparently, no one else was able to make such arrangements.

A total of 290 children were brought to Washington during August 1970. Howard University officials told us that the

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children had been selected on the basis of medical and dental needs. An official of the Association said that none had been brought to Washington without parental approval. An official of the Association said that Howard University had offered to treat all the children participating in the Head Start project as needed. Parental approval, however, could be obtained for only 290 children.

Information developed by Howard University indicated that, while the 290 children were in Washington, about 1,100 carious teeth had been corrected, 13 hernia operations had been performed, and 68 other cases received ambulatory care.

WAS IT ECONOMICAL TO BRING THE CHILDREN
TO WASHINGTON FOR TREATMENT

Howard University, under its contract with the Association, agreed to provide the medical and dental services in Mississippi at a cost of \$47,543, consisting of \$41,043 (computed at \$38.72 a child) for the examination and screening, treatment and medication, and laboratory diagnosis for the 1,060 children participating in the Head Start project; \$4,000 for the use of equipment and laboratory supplies; and \$2,500 for consulting fees and miscellaneous materials.

The university has billed the Association \$43,176 (about \$41 a child) for the services provided to the children in Mississippi and to the 290 children brought to Washington. The university's billing was supported by a certification that the professional services contracted for in the amount of \$41,043 had been provided and that equipment and supplies had cost \$2,133.

At the time of our review, Howard University financial records showed that costs recorded for this project totaled \$38,337, exclusive of professional salaries. We were told by a Howard University official that such salaries were not accumulated and charged to the project because the personnel came from various departments within the university. As many

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as 60 university staff members worked on the project at one time.

Information was not available at the Association regarding either the availability of local practitioners or other facilities for providing the needed services or the cost of such services. In the absence of such information, we did not attempt to evaluate the reasonableness of the Association's decision to enter into the agreement for the services to be provided by Howard University. The university subsequently found it necessary to bring some of the children to Washington for treatment because of the licensing problems it had encountered in Mississippi.

It appears that the Association entered into the agreement with Howard University because (1) it believed that there was no assurance that the health services could be provided locally in compliance with the nondiscriminatory provisions of the Civil Rights Act of 1964 and that its limited budget was insufficient to finance the cost of the services through the use of local practitioners, and (2) Howard University was willing to furnish the services needed within the budgeted funds available.

Because of the licensing problems, however, the university was unable to provide all the needed health services in Mississippi. Furthermore the university presently is having difficulty in providing similar dental services under its contract with the Association covering the second year of the Head Start project.

Howard University officials told us that providing the medical services under the agreement for the second year presented no problem because two of its doctors had obtained temporary licenses to practice until a permanent license could be obtained under reciprocity agreements. Because such agreements are not available for dentists, the university's dentists must take and pass an examination before being licensed to practice in the State.

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To date, four dentists have taken the examination and one has passed. University officials informed us that this dentist was providing services to the children. They also said that the university had contracted with one local dentist to provide services and that attempts were being made to contract with two other local dentists. Thus some dental services are available in Mississippi other than those being provided by Howard University.

Because the Association has not determined the extent to which dental services can be obtained locally or the cost of such services and because of the university's problem in providing the dental care in Mississippi, we plan to suggest to HEW that, when considering a renewal of the grant for the Head Start project, it determine whether the existing arrangement with Howard University is the most reasonable and practicable arrangement under the existing circumstances.

Concerning your constituent's suggestion that our Office investigate the expenditures of agencies where social activities are involved, we have full-time audit staffs assigned to HEW, the Office of Economic Opportunity, and other civil departments and agencies to make continuing reviews of their programs. Reports on these reviews are issued to the Congress and are summarized in the Comptroller General's Annual Report to the Congress.

HEW, the Association, and Howard University have not been asked to comment on this report.

Sincerely yours,



Comptroller General
of the United States

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02-640-1 The Honorable Thomas N. Downing
House of Representatives