

Audit Report

Austin Energy Medically Vulnerable Registry: Many customers are not able to access services due to a complex application process

March 2024



Austin Energy's Medically Vulnerable Registry (MVR) provides case management and assists customers with creation of an emergency back-up plan in the event of an outage for eligible customers with critical illnesses who rely on consistent electricity. People in the program appear to be satisfied with the program and believe the program meets their expectations. However, many customers are not able to access the MVR program due to a complex application process and may not be able to receive additional services provided through the MVR program. In 2022 and 2023, 70% or more of MVR applications were denied.

Additionally, manual processes present challenges including enrollment delays, data entry errors, and missing information. Applicant information is stored across multiple City and third-party systems, making it difficult to ensure all required pieces of information have been collected.

Contents

Objective & Background.....	2
What We Found.....	4
Recommendations & Management Response.....	10
Scope & Methodology.....	12

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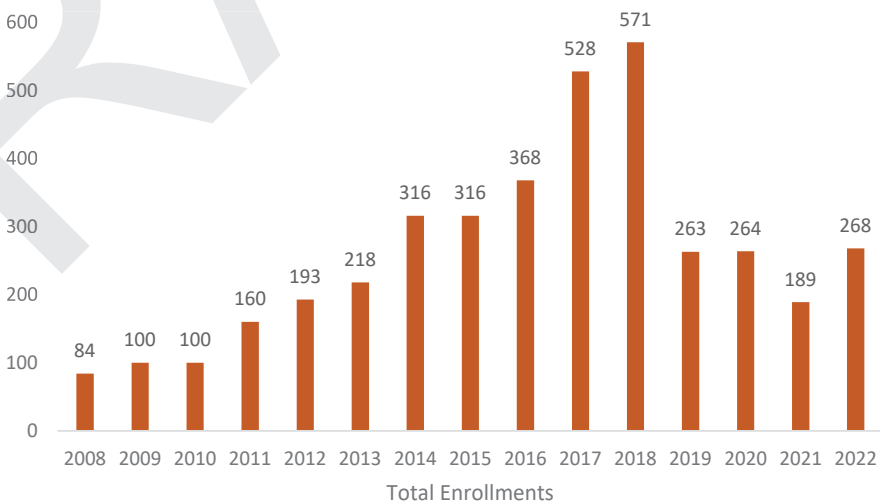
Objective

The objective of this audit was to determine if the City’s Registry for the Medically Vulnerable effectively and efficiently serves residential customers in need.

Background

Power outages can be dangerous, especially to customers with critical illnesses or who depend on electricity for life-saving medical equipment. Most life support systems require a continuous power supply to function properly. Austin Energy, the City’s electric utility, offers the Medically Vulnerable Registry (MVR) program. Eligible MVR customers receive case management and assistance creating an emergency back-up plan in the event of an outage.

Exhibit 1: Historically, enrollment in the MVR has varied from year to year



*Austin Energy staff said that numbers for 2017 and 2018 reflect pending applications as well as completed enrollments. More recent numbers only include certified enrollees.

**Austin Energy staff said enrollments paused briefly in 2021 to focus on providing COVID-19 assistance to customers through the Plus 1 Program.

Source: Medically Vulnerable Registry records provided by Austin Energy, December 2023

The City entered into an agreement with Solix, Inc. (Solix) to manage eligibility verification for the MVR. Also, the Austin Energy Discount Steering Committee, which is made up of community partners such as Any Baby Can, LifeWorks, and Travis County, works with Austin Energy to develop recommendations for the MVR. The MVR key stakeholders and their responsibilities are shown in Exhibit 2.

Exhibit 2: MVR activities involve several stakeholders

Stakeholders	Key MVR-related responsibilities
Austin City Council	<ul style="list-style-type: none"> • Sets policy
Austin Energy	<ul style="list-style-type: none"> • Monitors the City's contract with Solix • Coordinates with the MVR participants including monitoring customers' meters, notifying them about an outage, performing site visits, setting up payment plans, and making emergency plans with the MVR participants
Solix	<ul style="list-style-type: none"> • Verifies MVR eligibility • Schedules MVR site visits for Austin Energy staff • Notifies applicants of their acceptance into the MVR and application denial or removal from the MVR
Austin Energy Discount Steering Committee	<ul style="list-style-type: none"> • Collaborates with Austin Energy and other MVR stakeholders to provide recommendations related to the MVR to City Council
Social Service Partners	<ul style="list-style-type: none"> • Markets the MVR to eligible participants and provides guidance on MVR issues • Makes real-time referrals to Austin Energy when they encounter someone who has life-saving medical equipment

Source: Review of Austin Energy Medically Vulnerable Registry information, January 2023

What We Found

Summary

Austin Energy's Medically Vulnerable Registry (MVR) provides case management and assistance creating an emergency back-up plan in the event of an outage for eligible customers with critical illnesses who rely on consistent electricity. People in the program appear to be satisfied with the program and believe the program meets their expectations. However, many customers are not able to access the MVR program due to a complex application process and may face increased risks if they lose electricity. In 2022 and 2023, about 70% of MVR applications were denied due to incomplete applications. Additionally, applicants must mail or fax required information to apply or recertify for the MVR. This manual process presents challenges including delays in enrollment, data entry errors, and missing required information. Applicant information is stored across multiple City and third-party systems, making it difficult to ensure all required pieces of information have been collected.

Finding 1

Many Austin Energy customers are not able to access the City's Medically Vulnerable Registry due to a complex application process.

To qualify for Austin Energy's Medically Vulnerable Registry (MVR), the applicant must be a current Austin Energy account holder or someone who lives in the home of an Austin Energy account holder. An applicant must complete, sign, and submit an application to the City. The application requires the signature of a licensed physician indicating the qualifying medical condition and the length of time the condition is expected to last. The application also requires information about the patient and Austin Energy account holder as well as authorization for the City to conduct site visits. MVR participants are required to recertify periodically depending on the medical condition that is assigned by the physician. Depending on the condition, an MVR participant may have to recertify every 60 days or every year. The City gives a participant an extra 30 days to reapply after an initial certification or recertification period has expired, for a total of 90 days or 1 year and 30 days. Applicants seeking recertification must go through the same process as new applicants.

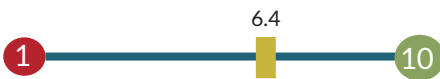
Additionally, the City of Austin requires MVR participants to recertify more often than other cities. While the City of Austin's recertification frequency ranges between 2-12 months, for the 6 other cities surveyed, recertification frequency ranges between 12-24 months. In addition, one city (Sacramento) offers a lifetime enrollment depending on the condition of the participant.

City of Austin Code, Section 15-9-23 establishes the MVR regulations and policies, including eligibility requirements, supporting documents to be filed by the applicant, and the frequency of certification.

The average rating among respondents for their **overall satisfaction** with the MVR and the program **meeting their expectations** were 8 out of 10 (10 being the best). The ratings ranged from 1 to 10.



The average rating among respondents on the **ease of the MVR reenrollment** process was 6.4 out of 10 (10 being very easy). However, the responses were extreme as ratings ranged from 0 to 10.



The average rating among respondents for their **satisfaction with the communication** relating to the MVR was 7.5 out of 10 (10 being very satisfied). However, the responses were extreme as ratings ranged from 0 to 10.



We surveyed a sample of 50 MVR participants on their experiences and perceptions related to the MVR process. The MVR participants who receive services are generally satisfied with the MVR and believe that the MVR meets their expectations. However, survey respondents noted some issues with the MVR enrollment and reenrollment process:

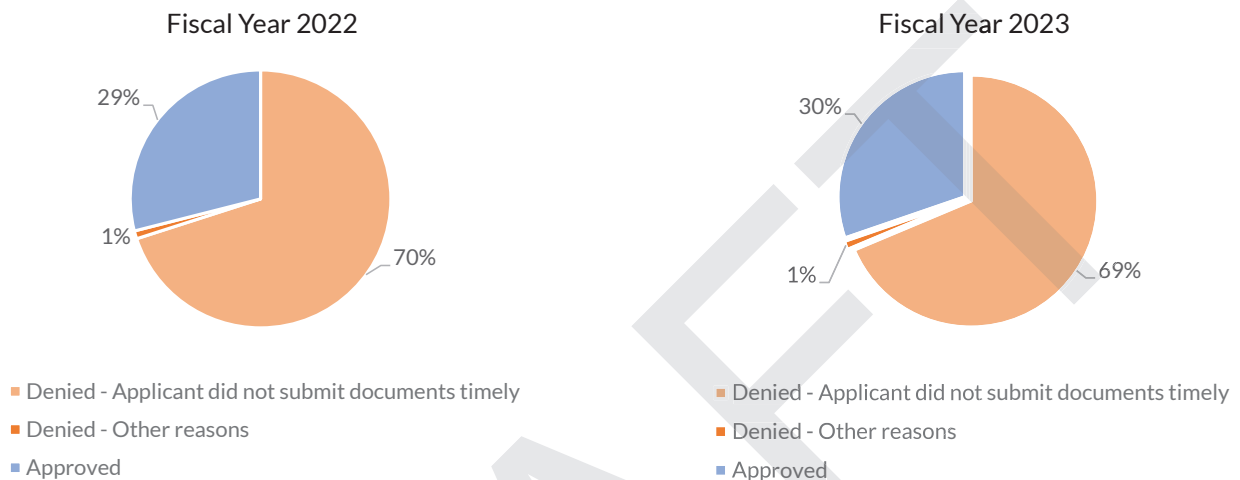
- Some respondents expressed frustrations with the enrollment process. 14 (45%) of the 31 people who responded to this question noted the process is inefficient mainly due to frequency of recertification, difficulties obtaining a physician's signature, and excessive paperwork. Respondents' comments include:
 - "It's a pain to have to go to the doctor to do it."
 - "The recertification process is not helpful. It is way too often."
 - "Doctor paperwork and recertification is a headache."
 - "Reduce the frequency and volume of required paperwork and fix the frequency of the recertification requirement."
- **Communication and coordination:** Some respondents stated that they encountered communication issues. Specifically, 11 (40%) out of the 28 people who responded to this question noted there is a lack of or inconsistent communication or assistance.
- **Respondents' recommendations:** Some respondents said the City needs to make some improvements. Specifically, 10 respondents noted that there is a need to reorganize or increase the services provided, 7 stated that the application process needs to be revamped, and 14 perceived a need to improve communication.

Austin Energy and Solix staff noted a need to reorganize the MVR application form. Parts A and C of the application are completed by a certified physician while part B is completed by the applicant and the account holder. Austin Energy and Solix staff said that the application is confusing to customers because it intertwines a section that customers are responsible for with the sections the physician is responsible for.

Austin Energy periodically surveys a sample of 75 MVR participants. In the surveys conducted for the years 2017, 2018, 2021, and 2023, respondents consistently identified the hassles related to the application and recertification process, frequency of reenrollment, and inadequate communication as their primary concerns. In the 2023 annual survey, when asked how well the MVR met their needs, 26% of the 50 people who responded to this question rated 5 or less on a scale of 1 to 10 (10 being excellent). 12% of the respondents rated it at 1. When asked what needs to be done for the MVR to meet their needs, respondents indicated a need to streamline the application process, improve communication, and have less frequent reenrollment.

Due to these MVR enrollment and reenrollment challenges, the City may not achieve the objectives of the MVR because many Austin Energy customers who need MVR services are unable to successfully enroll or reenroll. In our review of the fiscal year 2022 and 2023 MVR participation reports, more than 70% of applications were denied, primarily because the applicant did not get the necessary documentation within the required time frame.¹

Exhibit 3: About 70% of applications were denied from the Medically Vulnerable Registry in 2022 and 2023 due to applicants not submitting documents timely



*In fiscal year 2022, there were about 700 total applications and in 2023, there were about 1,000 total applications.
Source: Auditor analysis of Austin Energy's Medically Vulnerable Registry data, January 2024.

We found that the residents in apartment complexes with a master meter where the renters pay for their utilities to their property management are not able to participate in the MVR due to lack of an Austin Energy account associated with the individual residents. Based on the MVR eligibility requirements, to qualify for the MVR, the applicant must be an Austin Energy account holder or someone who lives in the home of an Austin Energy account holder. Austin Energy management said there are 92 master meters. Austin Energy does not have information about how many residents are associated with each of these meters.

Austin Energy management and staff noted that they are currently working on changes to the MVR application process. Staff stated that the proposed changes have been reviewed by Discount Steering Committee members and City Law Department staff. Austin Energy management plans to take proposed City Code changes to City Council in May 2024, with implementation proposed for June 2024. The changes include:

- Lengthening the amount of time between recertifications and including a lifetime certification option
- Allowing a broader range of medical service providers to certify eligibility

¹ An incomplete application does not necessarily mean that the customer would have been eligible if they had submitted all pieces of the application.

Finding 2

The City mainly uses a manual process to manage the Medically Vulnerable Registry application and eligibility verification. This increases the risk that the data may not be secure and reliable, and this may lead to inefficiencies.

The City's MVR processes, including the application and eligibility verification, are mainly manual, requiring faxed or mailed paper applications. The MVR information is tracked in multiple tools that do not automatically share information. This requires some data to be entered manually. This type of process leads to inefficiency and increases the risk for information errors.

Application and eligibility verification processes are manual.

As noted above, MVR participants are required to recertify between every two months to one year. Also, the City gives a participant an extra 30 days to reapply after an initial certification or recertification period has expired. During the initial application and any recertifications, MVR applicants are required to go through the same eligibility verification process. Based on the City's MVR process, all MVR applicants must mail or fax in their signed applications. Austin Energy staff said that sometimes this information is collected directly from the patient by Austin Energy staff during a site visit. A patient's physician is also required to mail or fax in the patient's eligibility-supporting information. This can be a burden for both customers and physicians. Austin Energy and Solix staff must enter received information in the system manually. This takes more effort to keep track of the various paper documents, find information, and keep the information secure.

Austin Energy staff stated that the manual process presents some challenges including receiving incomplete applications, which causes delays in enrollment and spending time combining two pieces of the applications that are turned in separately. We reviewed eligibility verification supporting documents for a sample of 100 MVR participants from fiscal years 2022 and 2023 and noted some applications that were missing key information. Specifically:

- 8 applications did not have a physician signature. Approving applications without physician signatures violates the MVR regulations in City Code, and approving these applications is inequitable to other customers who were denied from the MVR because they were not able to provide a physician signature.
- 24 applications were missing an MVR category. This category determines how often a patient is required to recertify for the MVR.
- 43 applications did not have the required patient and/or Austin Energy account holder signatures.

Austin Energy staff said that when Solix is unable to obtain a customer signature, Austin Energy staff will get the customer signature at a site visit. While this approach helps to ensure that people get into the MVR, it may appear inequitable for those applicants who were denied because of incomplete applications. Also, this impacts the productivity of MVR staff. Austin Energy staff stated that these added tasks take away Austin Energy's capacity to serve more people.

During the course of this audit, Austin Energy management said an online process will be completed in September 2024. Austin Energy and Solix management stated that they are both working to move the MVR application process online.

MVR applicant information is tracked in multiple tools that do not automatically share information, which results in inefficiency and the chance for information errors.

The City collects and keeps various information relating to MVR applicants including information collected from the applicants and physicians. The City also keeps track of communication between MVR staff, applicants, and physicians. This information is stored in multiple tools. Staff noted that these tools do not automatically share information. This makes it difficult for staff to readily combine information from the different sources into a detailed report. Staff noted that because the tools do not share information, some information is entered manually. This also increases the likelihood of errors and could result in the City making decisions based on an assortment of incomplete data. One MVR participant we surveyed noted that it took years with multiple certified letters to fix the fact that City staff had recorded that customer's name incorrectly.

As noted above, when Solix is unable to obtain a customer signature, Austin Energy staff said they will get the customer signature at a later site visit. When that happens, Austin Energy staff store these customer signatures in a different system from the rest of the application documents. Also, when an application is denied, Solix uses a third-party vendor to mail a denial letter to the respective applicant to let the applicant know that their application was denied and the reasons why it was denied.

While we did not find incidences relating to MVR information security, best practices indicate that manual processes including mailing/faxing documents and information back and forth increases the risk of information security.

Additional Observation

The City of Austin's Medically Vulnerable Registry program appears to offer more services than similar programs from cities we reviewed.

We surveyed a sample of six other cities' programs (Georgetown Utilities, New Braunfels Utilities, CPS Energy, Jacksonville Electric Authority, Sacramento Municipal Utility District, Tallahassee Electric Utility) designed to assist medically vulnerable customers during planned and unplanned power outages. We compared Austin Energy's Medically Vulnerable Registry to the sampled cities' programs.

Austin Energy's MVR offers more services than the surveyed cities' programs. While all the cities indicated that they notify customers of planned outages and provide extra time for the program participants to pay electric bills, Austin offers personalized case management, including site visits, and helps customers to establish an emergency back-up plan.

DRAFT

Recommendations and Management Response

1

To ensure that the Medically Vulnerable Registry is accessible to all qualifying Austin Energy customers who may need Medically Vulnerable Registry services, the General Manager of Austin Energy should continue working with stakeholders to resolve challenges accessing the Medically Vulnerable Registry including, at the minimum:

- a. Evaluating the frequency of recertification requirements and implementing necessary changes
- b. Evaluating the possibility of a wider range of entities who should be allowed to certify eligibility and implementing necessary changes

Management Response: Agree

Proposed Implementation Plan: Austin Energy staff has prepared code changes to the utility service regulation governing the Medically Vulnerable Registry (MVR) program to be submitted to council for approval. The code changes will reduce renewal frequency and expand the types of providers allowed to certify eligibility. These changes will improve the accessibility for MVR applicants, make the process more efficient and improve the customer experience. The Office of the Auditor's recommendations highlight the work Austin Energy has done over the past year, including multiple meetings with a key utility stakeholder group, Discount Steering Committee (DSC). The DSC consists of non-profit agencies who provide wrap around services to the community and work jointly with the utility to continually deliver better services to our most vulnerable community.

Proposed Implementation Date: May 30, 2024

2

To enhance the efficiency of the Medically Vulnerable Registry application process and ensure that required information is collected and retrievable, the General Manager of Austin Energy should:

- a. Incorporate an online option to receive application and recertification documents for the Medically Vulnerable Registry
- b. Re-organize the existing application forms to ensure that the sections to be filled by the applicant and the physician are well-aligned

Management Response: Agree

Proposed Implementation Plan: Austin Energy has begun the process of creating a new online application for Medically Vulnerable Registry customers. This portal will allow both parties, the customers and the providers, to sign applications and document MVR qualifications. Due to the complexities of this technology intake process, which includes scoping and requirements gathering; identifying potential risks around data security; and testing as well as implementing the final product; the work to create a new portal is expected to be extensive. Austin Energy staff prioritized this work to be completed this fiscal year. Application redesign for paper forms will also be completed this fiscal year.

Proposed Implementation Date: September 30, 2024

Scope

The audit scope included the Austin Energy Medically Vulnerable Registry activities and practices during fiscal years 2022 and 2023.

Methodology

To complete this audit, we performed the following steps:

- Interviewed staff from Austin Energy and Solix, Inc.
- Reviewed federal, state, and local laws and regulations on registries for medically vulnerable populations.
- Researched leading practices for registries for medically vulnerable populations.
- Reviewed plans, policies, procedures, and other relevant documentation related to the Austin Energy Medically Vulnerable Registry.
- Reviewed contracts, agreements, training, performance measures, and funding information related to the Austin Energy Medically Vulnerable Registry.
- Reviewed past survey results for the Austin Energy Medically Vulnerable Registry taken by participants.
- Surveyed a sample of 50 Austin Energy Medically Vulnerable Registry participants on their experiences and perceptions related to the Medically Vulnerable Registry. We selected participants who had a variety of experiences with the Medically Vulnerable Registry program such as applying, recertifying, and denial. Results are not intended to be projected to the whole population.
- Analyzed a sample of eligibility verification related documents for 100 Austin Energy Medically Vulnerable Registry participants. We selected participants who had a variety of experiences with the Medically Vulnerable Registry program such as applying, recertifying, and denial. Results are not intended to be projected to the whole population.
- Surveyed a sample of other cities (City of San Antonio, City of Jacksonville, City of Sacramento, City of Tallahassee, City of New Braunfels, and City of Georgetown) and compared the Austin Energy's Medically Vulnerable Registry to similar programs from the sampled cities.
- Evaluated internal controls related to the Austin Energy's Medically Vulnerable Registry process.
- Evaluated the risk of fraud, waste, and abuse for Austin Energy's Medically Vulnerable Registry process.

Audit 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.

The Office of the City Auditor was created by the Austin City Charter as an independent office reporting to City Council to help establish accountability and improve City services. We conduct performance audits to review aspects of a City service or program and provide recommendations for improvement.

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