AMENDED FISCAL REPORTS For Fiscal Years:

July 1, 2019 to June 30, 2020 July 1, 2020 to June 30, 2021

Mifflin County Children and Youth Agency

June 2023



Commonwealth of Pennsylvania Department of the Auditor General

Timothy L. DeFoor • Auditor General



Commonwealth of Pennsylvania
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TIMOTHY L. DEFOOR AUDITOR GENERAL

The Commissioners of Mifflin County Mifflin County Courthouse 20 North Wayne Street Lewistown, PA 17044-1707

Dear Commissioners:

We have fulfilled the requirements pursuant to authority derived from Act 148 of 1976, as amended, (62 P.S. § 704.1(a)(4)) for the submitted CY-370 Expenditure Report, the CY-370A Revenue Report, and the CY-348 Fiscal Summary, hereinafter referred to as the submitted fiscal reports, and the related financial records of Mifflin County Children & Youth Agency (agency). The purpose of this engagement is to ascertain and certify the actual commonwealth expenditures incurred on behalf of children residing within the county for the fiscal years July 1, 2019 to June 30, 2020, and July 1, 2020 to June 30, 2021. The scope of our engagement was limited to the fiscal reports submitted to the Pennsylvania Department of Human Services (DHS) as part of the Act 148 Invoice Packages for the fiscal years ended June 30, 2020, and June 30, 2021.

Agency management is responsible for the preparation of the submitted fiscal reports, and compliance with children, youth, and families' regulations. Our engagement procedures included a review of selected agency records and other procedures we deemed necessary to enable us to ascertain and certify the actual commonwealth expenditures incurred on behalf of children residing within the county. We also performed procedures to determine the county's compliance with certain provisions of 55 Pa. Code, Part V. Children, Youth, and Families Manual, Subpart C, Chapters 3140 and 3170 (55 Pa. Code §§ 3140.1 et seq. and 3170.1 et seq.). The engagement was not conducted, nor was it required to be, in accordance with professional auditing or attestation standards. We believe that our engagement procedures provided us a reasonable basis to ascertain and certify the actual commonwealth expenditures incurred on behalf of children residing within Mifflin County.

We certify the enclosed amended fiscal reports fairly present, in all material respects, the total commonwealth expenditures paid on behalf of children residing within the county for the 2019-2020 and 2020-2021 fiscal years based on the accrual basis of accounting.¹

Adjustments to the agency's submitted fiscal reports resulting from the procedures we performed during this engagement are as follows:

- For the **2019-2020 fiscal year**, our engagement resulted in one adjustment being made to the agency's submitted fiscal reports. This adjustment in total impacted the agency's Net State Share by decreasing agency expenditures by \$487. Based on the application of the state participation rates, this adjustment resulted in an amount due to the state totaling \$292.
- For the **2020-2021 fiscal year**, our engagement resulted in no adjustments made to the agency's submitted fiscal reports.

This report includes the following finding and observation:

Finding – Mifflin County Children and Youth Agency Funds Were Commingled With Funds in the County's General Fund.

Observation – Despite the Pennsylvania Department of Human Services Apparent Strides in Increasing the Protection of At-Risk Children in the Care of Contracted In-Home Preventative Service Providers, DHS Failed to Review the Adequacy of the C&Y Agencies Procedures and Results for Ensuring these Providers Comply with CPSL Requirements.

The results of our engagement procedures, as presented in this report, were discussed agency management at an exit conference held on May 4, 2023.

This report is being forwarded to the DHS Bureau of Financial Operations and the Office of Children, Youth, and Families for review and settlement of any recommended adjustments included in our amended fiscal reports. You will be notified by DHS of the decisions made regarding the approval and finalization of any recommended adjustment amounts during the DHS settlement process and the impact, if any, on a future Act 148 payment. At that time, in accordance with the Commonwealth's General Rules of Administrative Practice and Procedure, 1 Pa. Code § 31.1 et seq., you will be afforded the opportunity by Commonwealth DHS to appeal its settlement process decision.

¹ In accordance with DHS regulations, the expenditures reported in the enclosed fiscal reports are limited to expenditures funded by allocations made pursuant to Act 148 of 1976, as amended, (62 P.S. § 704.1) and do not include any expenditures made from other appropriations or grant funds.

We appreciate the cooperation, assistance, and courtesy granted to our representatives by your officials and agency staff. If you have any questions, please feel free to contact the Bureau of County Audits at 717-787-1363.

Sincerely,

Timothy L. DeFoor

Auditor General

May 8, 2023

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BACKGROUND

The Department of the Auditor General (department) is responsible for reviewing the fiscal reports known as the submitted CY-370 Expenditure Report, the CY-370A Revenue Report, and the CY-348 Fiscal Summary of the 67 County Children and Youth Agencies. The department determines proper reporting and utilization of funds according to program regulations and guidelines under the Human Services Code 62 P.S. § 704.1(a)(4). The annual state Act 148 allocations are used by the counties to administer social services for the children and youth that reside within the Commonwealth of Pennsylvania, whose stated goal is "to ensure, for each child in this Commonwealth, a permanent, legally assured family which protects the child from abuse and neglect." The Children and Youth Social Services Program is county-administered and state-supervised by DHS, with shared responsibility for achieving the commonwealth's goal.

In accordance with the Human Services Code (62 P. S. § 703), DHS is responsible for making and enforcing all rules and regulations necessary and appropriate to the proper accomplishment of the child welfare duties and functions vested by law in the county institution districts or their successors. Title 55 Pa. Code, Part V. Children, Youth, and Families Manual, Subpart C, outlines the rules and regulations relative to the county administration of the Children and Youth Social Service Programs. Specifically, in compliance with 55 Pa. Code § 3140.31, the counties must report their cumulative actual expenditures incurred for the provision of children and youth social services on a quarterly basis to DHS through the Act 148 invoice package, which includes the fiscal reports. The expenditures reported in the Act 148 invoice package refers to all costs for dependent and delinquent children and youth services funded or administered by DHS.

We reviewed the final, cumulative 4th quarter fiscal reports submitted to DHS, the agency's related financial records, and other supporting documentation. This was done to determine whether the agency's actual, cumulative expenditures and revenues were properly reported to DHS for the respective fiscal years. The amended fiscal reports below include any adjustments we considered necessary to reflect the agency's actual related revenue, expenditures, and net state share for each fiscal year in our engagement period.

SECTION 1

AMENDED FISCAL REPORTS FOR THE FISCAL YEAR:

JULY 1, 2019 to JUNE 30, 2020

MIFFLIN COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2019 TO JUNE 30, 2020 AMENDED

COMPUTATION OF FINAL NET STATE SHARE

Approved State Allocation ¹			\$	4,800,740
Supplemental Act 148			_	0
Total State Allocation				4,800,740
State Share (CY348) ²	\$	4,051,408		
Less: Major Service Category Adjustment		0	_	
Net State Share			\$	4,051,408
Less: Expenditures in Excess of the Approved State Allo	cation		_	0
Final Net State Share Payable ³			\$	4,051,408
Actual Act 148 Revenues Received ⁴			_	4,051,700
Net Amount Due County/(State) ⁵			\$_	(292)

¹ Approved State Allocation is the amount of Act 148 State Funds that were budgeted for the County.

² State Share (CY348) is the total amount of County expenditures that are eligible for reimbursement from Act 148 Funds after auditor's adjustments are considered.

³ Final Net Share Payable is the net amount of reimbursable expenditures from Act 148 funds after auditor's adjustments are considered.

⁴ Actual Act 148 Revenues Received is the amount of Act 148 funds the County received.

⁵ Net Amount Due the County/(State) is the variance between the amount of Act 148 funds the County received and the Final Net State Share Payable to the County.

MIFFLIN COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2019 TO JUNE 30, 2020 AMENDED CY348 FISCAL SUMMARY

	A	В	C	D	ш	ш	Ð	Н	П	ſ	×
							Child Welfare				
	GRAND	PROGRAM	TITLE		TITLE	TITLE	Demonstration	MEDICAL	NET	STATE	LOCAL
	TOTAL	INCOME	IV-E	TANF	XX	IV-B	Project Title IV-E	ASSISTANCE	TOTAL	ACT 148	SHARE
NET CHILD WELFARE EXPENDITURES											
01. 100% REIMBURSEMENT	35,831	0	6,296	0	0	0	0	0	29,535	29,535	0
02. 90% REIMBURSEMENT	28,154	0	5,146	0	0	0	0	0	23,008	20,707	2,301
03. 80% REIMBURSEMENT	5,787,257	70,210	1,208,408	29,537	0	0	0	0	4,479,102	3,583,284	895,818
04. 60% REIMBURSEMENT	610,946	29,204	66,599	0	36,827	24,215	0	1,330	449,771	29,862	179,909
05. 50% REIMBURSEMENT	304,816	8,777	0	0	0	0	0	0	296,039	148,020	148,019
06. TOTAL NET CHILD WELFARE EXPEND.	6,767,004	108,191	1,289,449	29,537	36,827	24,215	0	1,330	5,277,455	4,051,408	1,226,047
YDC/YFC PLACEMENT COSTS											
07. 60% DHS PARTICIPATION	119,196	2,850							116,346	808'69	46,538
08. NON-REIMBURSABLE EXPENDITURES	2,648	0							2,648		2,648
09. TOTAL EXPENDITURES	6,888,848	111,041	1,289,449	29,537	36,827	24,215	0	1,330	5,396,449	4,121,216	1,275,233
10. TOTAL TITLE IV-D COLLECTIONS	90,825										
		-									
11. TITLE IV-D Collections for IV-E Children	35,052										
12. STATE ACT 148 - line 6	4,051,408										
		_									
13. STATE ACT 148 ALLOCATION	4,800,740										
14. ADJUSTED STATE SHARE (lower of 12 or 13)	4,051,408										
שיאיזיים											
INVOICE											
AMENDED STATE SHARE (ACT 148) ACT 148 AMOUNT RECEIVED	4,051,408 4,051,700										
ADJUSTMENT TO STATE SHARE	(262)										
THE CONTRACT OF THE CONTRACT O	(1)										

MIFFLIN COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2019 TO JUNE 30, 2020 AMENDED CY370A REVENUE REPORT

MAJOR SERVICE CATEGORIES												
& COST CENTERS	,	•	•	,	,	REVENUE	REVENUE SOURCES			,	:	
	TOTAL		3	4	2	9	7	S Child Welfare	9 MEDICAT	NET DEIMBERABLE	II	12
IN-HOME	KEIMBURSABLE EXPENDITURES	PROGRAM INCOME	MAINTENANCE	ADMIN.	TANF	TITLE XX T	TITLE IV-B	Demonstration Project Title IV-E	MEDICAL ASSISTANCE	KEIMBURSABLE EXPENDITURES	SIAIE ACT 148	SHARE
1-A ADOPTION SERVICE	35,831	0		_	1=		0	0	0	1	29,535	0
1-B ADOPTION ASSISTANCE	1,179,273	0	550,153	12,304			0	0	0	616,816	493,453	123,363
1-C SUBSIDIZED PERMANENT LEGAL CUSTODIANSH		0	17,656	0			0	0	0	108,126	86,501	21,625
1-D COUNSELING - DEPENDENT	1,063,494			0	29,537	0	0	0	0	1,0	827,166	206,791
	31,872	0		0	0	0	0	0	0	31,	25,498	6,374
1-F DAY CAKE	79/	0		0	0	0	0	0	0	79/	010	751
1-0 DAT INCATMENT - DEFENDENT	26357	0		0	0 0	0	0	0	0	269 27	000 85	14 775
1-1 HOMEMAKER SERVICE	0	0		0	0 0	0	0	0	0		00,00	0
	93.117			17.077	0	0	0	0	0	76.040	60.832	15.208
	0	0		0	0	0	0	0	0	0	0	0
1-L LIFE SKILLS - DELINQUENT	0	0		0	0	0	0	0	0	0	0	0
1-M PROTECTIVE SERVICE - CHILD ABUSE	318,544	0		57,863	0	0	0	0	0	260,681	208,545	52,136
1-N PROTECTIVE SERVICE - GENERAL	1,311,475	0		117,956	0	0	0	0	0	1,193,519	954,815	238,704
1-O SERVICE PLANNING	142,984	0		25,323	0	0	0	0	0	117,661	94,129	23,532
1-P JUVENILE ACT PROCEEDINGS - DEPENDENT	26,069	0		0	0		0	0	0	26,069	13,035	13,034
1-Q JUVENILE ACT PROCEEDINGS - DELINQUENT	0	0		0			0	0	0	0	0	0
1-R SUBTOTAL IN-HOME	4,402,828	0	567,809	236,819	29,537	0	0	0	0	3,568,663	2,853,019	715,644
COMMUNITY BASED	TOTAL	PROGRAM	TITLE IV-E	TITLE IV-E				Child Welfare Demonstration	MEDICAL	NET REIMBURSABLE	STATE	LOCAL
PLACEMENT	EXPENDITURES	INCOME	MAINTENANCE		TANF	TITLE XX T	TITLE IV-B	Project Title IV-E	ASSISTANCE		ACT 148	SHARE
2-A ALTERNATIVE TREATMENT - DEPENDENT	0	0	0	0		0	0	0	0	0	0	0
2-B ALTERNATIVE TREATMENT - DELINQUENT	0	0	0	0		0	0	0	0	0	0	0
2-C COMMUNITY RESIDENTIAL - DEPENDENT	14,884		0	2,730		0	0	0	0		9,723	2,431
2-D COMMUNITY RESIDENTIAL - DELINQUENT	23,717		0			0	0	0	0		18,974	4,743
2-E EMERGENCY SHELTER - DEPENDENT	28,154		905	4,241	0	0	0	0	0	23,008	20,707	2,301
2-F EMERGENCY SHELTER - DELINQUENT	0		0		0	0	0	0	0		0	0
2-G FOSTER FAMILY - DEPENDENT	988,983	36,18	100,197	185,48		0	0	0	0	667,11	533,692	133,423
2-H FOSTER FAMILY - DELINQUENT	0	0 20	0	0		0	0	0	0	0	0	0
2-1 KINSHIP CARE - DEFENDENT	402,207		100,04			0	0	0	0	100,002	200,241	000,00
	12.756		0	0		0	0	0	0	12.756	10.205	2.551
2-L SUP. INDEPENDENT LIVING - DELINQUENT	0		0	0		0	0	0	0	0	0	0
2-M SUBTOTAL CBP	1,474,483	70,210	146,453	268,769	0	0	0	0	0	989,051	793,542	195,509
	TOTAL							Child Welfare		NET		
INSTITUTIONAL	REIMBURSABLE	PROGRAM	TITLE IV-E	Ī				Demonstration	MEDICAL		STATE	LOCAL
PLACEMENT 2 A HINDENIH E RETENITION SERVICE	EXPENDITURES 278 747	INCOME	MAINTENANCE	ADMIN.	_		TITLE IV-B	Project Title IV-E	ASSISTANCE	EXPENDITURES	ACT 148	SHARE
3-A JOVENILE DELENTION SERVICE 3 D. DESIDENTIAL SEDVICE DEBENDENT	27876		24.162	0.153	≣ਵ				0	12,054	594,961 557 301	134,983
3-b nesidential service - defendent	170,300		24,103	0,132		26077	2177	0	0		105,032	70,422
3-C NES. SERVICE - DELINCOENT (NON TROTFC) 3-D SECURE RES. SERVICE (FXCPT YDC)	0			7			C17,47	0	0		00,040	(380)
3-E YDC SECURE	119,196	2			=	-				116.346	808.69	46.538
3-F SUBTOTAL INSTITUTIONAL	805,710	4			0	36,827	24,215		0	671,500	375,903	295,597
NOTE A GENERAL TO NOTE A GENER	202 170	0		27.75		C	C	0	1 330	164 687	757 80	65 935
T ADMINISTRATION	203,117	0		207,16		0	0		000,1	104,507	70,132	00,00
5 TOTAL REVENUES	6,886,200	111,041	738,445	551,004	29,537	36,827	24,215	0	1,330	5,393,801	4,121,216	1,272,585

MIFFLIN COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2019 TO JUNE 30, 2020 AMENDED CY370 EXPENDITURE REPORT

	& COST CENTERS		0	OBJECTS OF EXPENDITURE		3							
		1	2	3	4	5	9	7	8	6	10	11	12
		WAGES	THE STATE OF THE S			dio 1110 di 14	T.	I HOE	Children	Children	Non-	_	Program Income
IN-HOME	Ξ	AND SALARIES	BENEFITS	SUBSIDIES	OPERATING	PURCHASED SERVICES	ASSETS	TOLAL EXPENDITURES	Served (by county)	Served (Purchased)	Keimbursable Non PS\Sub.	Purchased Serv/ Subsidies	related to all Non- Reimbursable
-A ADOPTI	1-A ADOPTION SERVICE	23,736			6,851	0	0	35,831		0	0	0	0
1-B ADOPTI	ADOPTION ASSISTANCE	0	0	1,179,273	0	0	0	1,179,273	0	133	0	0	0
-C SUBSID.	I-C SUBSIDIZED PERMANENT LEGAL CUSTODIANSHI		0	125,782	0	0	0	125,782	0	14	0	0	0
-D COUNS	I-D COUNSELING - DEPENDENT	0	0		75	1,063,419	0	1,063,494	0	187	0	0	0
-E COUNS	I-E COUNSELING - DELINQUENT	0	0		0	31,872	0	31,872	0	8	0	0	0
I-F DAY CARE	ıRE	0	0		0	2,647	0	2,647	0	5	0	1,885	0
-G DAY TR	1-G DAY TREATMENT - DEPENDENT	0	0		0	0	0	0	0	0	0	0	0
I HOMEN	I-H DAT IKEAIMENI - DELINQUENI	0	0		0	0,0,0	0	0,5,623	0	11	0	0	0
I-I INTAKE	INTAKE & REFERRAL	64 542	15.028		13 547	0 0	0 0	93 117	757	0	0	0	0
-K LIFF SK	1-8 I.TEF SKILLS - DEPENDENT	0.0	070,01		0,047	0	0	0	0	0	0	0	0
I-L LIFE SK	LIFE SKILLS - DELINOUENT	0	0		0	0	0	0	0	0	0	0	0
-M PROTEC	I-M PROTECTIVE SERVICE - CHILD ABUSE	213,721	49,945		54,944	0	0	318,610	341	0	99	0	0
1-N PROTEC	PROTECTIVE SERVICE - GENERAL	438,663	104,076		107,041	661,948	0	1,311,728	1,127	2,584	253	0	0
-O SERVIC	I-O SERVICE PLANNING	94.590	22,120		26,295	0	0	143,005	1,468	0	21	0	0
-P JUVENI	1-P JUVENILE ACT PROCEEDINGS - DEPENDENT				0	26,069		26,069	0	58	0	0	0
Q JUVENI	1-Q JUVENILE ACT PROCEEDINGS - DELINQUENT				0	0		0	0	0	0	0	0
1-R	SUBTOTAL IN-HOME	835,252	196,413	1,305,055	208,753	1,859,580	0	4,405,053			340	1,885	0
-		mber of Chile	Iren receiving	only NON-PI	Number of Children receiving only NON-PURCHASED IN-Home Services	-Home Services	0						
		WAGES	,	•					DAYS	Children	Non-		Program Income
	COMMUNITY BASED PLACEMENT	AND SALARIES	EMPLOYEE BENEFITS	SUBSIDIES	SUBSIDIES OPERATING	PURCHASED SERVICES	FIXED	TOTAL EXPENDITURES	OF	Served (Purchased)	Reimbursable Non PS\Sub	Purchased Serv/ Subsidies	related to all Non- Reimbursable
-A ALTER	2-A ALTERNATIVE TREATMENT - DEPENDENT	0		0	0	0	0	0	0	0	0	0	0
-B ALTER	2-B ALTERNATIVE TREATMENT - DELINOUENT	0	0	0	0	0	0	0	0	0	0	0	0
C COMML	2-C COMMUNITY RESIDENTIAL - DEPENDENT	9,904	2,305	0	2,675	0	0	14,884	0	0	0	0	0
-D COMML	2-D COMMUNITY RESIDENTIAL - DELINQUENT	0	0	0	201	23,516	0	23,717	159	3	0	0	0
-E EMERG	2-E EMERGENCY SHELTER - DEPENDENT	11,073	2,579	0	3,816	10,691	0	28,159	158	13	5	0	0
-F EMERG	2-F EMERGENCY SHELTER - DELINQUENT	0	0	0	0	0	0	0	0	0	0	0	0
-G FOSTER	2-G FOSTER FAMILY - DEPENDENT	197,546	50,071	0	65,075	676,508	0	989,200	601'6	46	217	0	0
H FOSTER	2-H FOSTER FAMILY - DELINQUENT	0	0	0	0	0	0	0	0	0	0	0	0
-I KINSHII	2-1 KINSHIP CARE - DEPENDENT	69,131	12,396	0	19,957	304,505	0	405,989	5,352	33	0	0	0
-J KINSHIL	2-J KINSHIP CARE - DELINQUENT	0	0	0	0	0	0	0	0	0	0	0	0
K SUP. IN	2-K SUP. INDEPENDENT LIVING - DEPENDENT	0	0	0	0	12,756	0	12,756	9	-	0	0	0
L SUP. IN.	2-L SUP. INDEPENDENT LIVING - DELINQUENT	0	0	0	0 01 734	0	0	0	0	0	0	0	0
1/1-7	SUBIOIALUBE	40,707	100,00	O	71,/24	1,027,970	D	1,4/4,00	14,704	90	777	D	O
	INSTITUTIONAL	WAGES	EMPLOYEE			PURCHASED	FIXED	TOTAL	DAYS	Children Served	Non- Reimbursable	Non-Reim. Purchased Serv/	Non-Reim. Program
	PLACEMENT	SALARIES	BENEFITS	SUBSIDIES	OPERATING	SERVICES	ASSETS	EXPENDITURES	CARE	(Purchased)	Non PS\Sub.		Income
-A JUVENI	3-A JUVENILE DETENTION SER VICE	0	0	0	0	278,794	0	278,794	214	11	47	0	0
B RESIDE	3-B RESIDENTIAL SERVICE - DEPENDENT	7,984	1,838	0	4,842	213,794	0	228,458	1,439	~	06	0	0
C RES. SE	3-C RES. SERVICE - DELINQUENT (EXCEPT YDC/YFC)	0	0	0	756	178,649	0	179,405	1,163	10	9	0	0
3-D SECURE RES.	3-D SECURE RES. SERVICE (EXCEPT YDC) 2 E VDC SECTIOR	0	0	0	0	110 106	0	0 0110 106	73.1	0	0	0	0
1 DC 3E	CHINDSTAL INSPIRITIONAL	0 00 1	0.01	0	5 500	700 422	0 0	119,190	7047	c C	143	0	
3-F	SUBTOTAL INSTITUTIONAL	1,984	1,838	0	5,598	/90,433	0	805,853	3,047	32	143	0	0
4 ADMIN	4 ADMINISTRATION	56,551	12,545	0	134,141	0	0	203,237			58	0	0
5	TOTAL EXPENDITURES	1,187,441	278,147	1,305,055	440.216	3 677 980	0	81/8 888 9			275	1 00 5	
					017,011	10111100	>	0,000,010			CO/	1,885	0

MIFFLIN COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2019 TO JUNE 30, 2020 AMENDED

SUMMARY OF EXPENSE AND EXPENSE ADJUSTMENTS

			AS		Diabelae		AS
COCT CD	VIEW VIEW VC		REPORTED		INCREASE		AMENDED PER
COST CEN	NTER ITEMS		PER CY370		(DECREASE)		CY370
Adoption Service		\$	35,831	\$	0	\$	35,831
Adoption Assistance		Ψ	1,179,273	Ψ	0	Ψ	1,179,273
Subsidized Permanent Le	egal Custodianshin		125,782		0		125,782
Counseling	Sar e acte aminip		1,095,366		0		1,095,366
Day Care			2,647		0		2,647
Day Treatment			73,625		0		73,625
Homemaker Service			0		0		0
Intake and Referral			93,117		0		93,117
Life Skills			0		0		0
Protective Service - Child	d Abuse		318,610		0		318,610
Protective Service - Gene			1,311,728		0		1,311,728
Service Planning			143,005		0		143,005
Juvenile Act Proceedings			26,069		0		26,069
Alternative Treatment			0		0		0
Community Residential			38,601		0		38,601
Emergency Shelter			28,159		0		28,159
Foster Family			989,200		0		989,200
Kinship Care			405,989		0		405,989
Supervised Independent	Living		12,756		0		12,756
Juvenile Detention Service			278,794		0		278,794
Residential Service			407,863		0		407,863
Secure Residential Service	e (Except YDC)		0		0		0
YDC Secure	(I)		119,196		0		119,196
Administration			203,724		(487)		203,237
	Combined Total Expense	•	6,889,335		(487)	-	6,888,848
	Less Non-reimbursables	-	2,648		0	-	2,648
	Total Net Expense	\$	6,886,687	\$	(487)	\$_	6,886,200
			AS				AS
			REPORTED		INCREASE		AMENDED PER
OBJECTS OF	EXPENDITURE		PER CY370		(DECREASE)		CY370
Wages and Salaries		\$	1,187,441	\$	0	\$	1,187,441
Employee Benefits			278,147		0		278,147
Subsidies			1,305,055		0		1,305,055
Operating			440,703		(487)		440,216
Purchased Services			3,677,989		o o		3,677,989
Fixed Assets			0		0		0
	Combined Total Expense	•	6,889,335		(487)	_	6,888,848
	Less Non-reimbursables		2,648		0	_	2,648
	Total Net Expense	\$	6,886,687	\$	(487)	\$_	6,886,200

MIFFLIN COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2019 TO JUNE 30, 2020 ADJUSTMENT SCHEDULE

REPORT	'REFEI	RENCE	4DI		AC DEDODEED	DIODE A CE/	A DH IOTED
			ADJ.		AS REPORTED	INCREASE/	ADJUSTED
SCHEDULE	LINE	COLUMN	NO.	EXPLANATION OF ADJUSTMENTS	OR ADJUSTED	(DECREASE)	TOTAL
				CY-370 Adjustment			
CY-370	4	4	1	Administration - Operating	\$ 118,984	\$ (487)	\$ 118,497
				To decrease expenditures by \$487 to properly report indirect costs and reconcile to the County Cost Allocation Plan.			
				Title 55 PA Code, Chapter 3170.95(a)(b) CY&F Bulletin 00-95-02			

SECTION 2

AMENDED FISCAL REPORTS FOR THE FISCAL YEAR:

JULY 1, 2020 to JUNE 30, 2021

MIFFLIN COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2020 TO JUNE 30, 2021 AMENDED

COMPUTATION OF FINAL NET STATE SHARE

Approved State Allocation ¹		\$	5,403,249
Supplemental Act 148		_	0
Total State Allocation			5,403,249
State Share $(CY348)^2$ \$	4,210,475		
Less: Major Service Category Adjustment	0	_	
Net State Share		\$	4,210,475
Less: Expenditures in Excess of the Approved State Allocation		_	0
Final Net State Share Payable ³		\$	4,210,475
Actual Act 148 Revenues Received ⁴		_	4,210,475
Net Amount Due County/(State) ⁵		\$_	0

¹ Approved State Allocation is the amount of Act 148 State Funds that were budgeted for the County.

² State Share (CY348) is the total amount of County expenditures that are eligible for reimbursement from Act 148 Funds after auditor's adjustments are considered.

³ Final Net Share Payable is the net amount of reimbursable expenditures from Act 148 funds after auditor's adjustments are considered.

⁴ Actual Act 148 Revenues Received is the amount of Act 148 funds the County received.

⁵ Net Amount Due the County/(State) is the variance between the amount of Act 148 funds the County received and the Final Net State Share Payable to the County.

MIFFLIN COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2020 TO JUNE 30, 2021 AMENDED CY348 FISCAL SUMMARY

	А	В	C	D	Е	F	G	Н	I	J	K
	GRAND	PROGRAM	TITLE		TITLE	TITLE	FAMILY FIRST	MEDICAL	NET	STATE	LOCAL
	TOTAL	INCOME	IV-E	TANF	XX	IV-B	TRANSITION ACT	TRANSITION ACT ASSISTANCE	TOTAL	ACT 148	SHARE
NET CHILD WELFARE EXPENDITURES											
01. 100% REIMBURSEMENT	40,357	0	7,489	0	0	0	0	0	32,868	32,868	0
02. 90% REIMBURSEMENT	36,858	0	10,976	0	0	0	0	0	25,882	23,294	2,588
03. 80% REIMBURSEMENT	6,098,814	33,841	1,344,542	29,537	0	0	0	0	4,690,894	3,752,714	938,180
04. 60% REIMBURSEMENT	635,313	20,397	149,146	0	36,827	24,215	0	1,861	402,867	241,720	161,147
05. 50% REIMBURSEMENT	321,019	1,263	0	0	0	0	0	0	319,756	159,879	159,877
06. TOTAL NET CHILD WELFARE EXPEND.	7,132,361	55,501	1,512,153	29,537	36,827	24,215	0	1,861	5,472,267	4,210,475	1,261,792
ממשאיים מדירות ניוים. בידת המדיצוים מדי											
YDC/YFC PLACEMENT COSTS											
07. 60% DHS PARTICIPATION	336,582	5,700							330,882	198,529	132,353
08. NON-REIMBURSABLE EXPENDITURES	4,681	0							4,681		4,681
09. TOTAL EXPENDITURES	7,473,624	61,201	1,512,153	29,537	36,827	24,215	0	1,861	5,807,830	4,409,004	1,398,826
10. TOTAL TITLE IV-D COLLECTIONS	57,622										
11. TITLE IV-D Collections for IV-E Children	23,271										
12. STATE ACT 148 - line 6	4,210,475										
13. STATE ACT 148 ALLOCATION	5,403,249										
14. ADJUSTED STATE SHARE (tower of 12 or 13)	4,210,475										
INVOICE		_									
AMENDED STATE SHARE (ACT 148) ACT 148 AMOUNT RECEIVED	4,210,475										
ADJUSTMENT TO STATE SHARE	0										

MIFFLIN COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2020 TO JUNE 30, 2021 AMENDED CY370A REVENUE REPORT

MAJOR SERVICE CATEGORIES & COST CENTERS						REVENU	REVENUE SOURCES					
	1	2	3	4	5	9	7	8	6	10	11	12
N HOME	TOTAL REIMBURSABLE EXPENDITIBES	PROGRAM	TITLE IV-E	TITLE IV-E	TANE	TITIEXY	тт в м в	Family First	MEDICAL	NET REIMBURSABLE EXPENDITIBES	STATE	LOCAL
1-A ADOPTION SERVICE	40,357	0		7,489			0	0	0	32,868	32,868	0
1-B ADOPTION ASSISTANCE	1,283,887	0	656,499	7,422			0	0	0	619,966	495,973	123,993
1-C SUBSIDIZED PERMANENT LEGAL CUSTODIANSH	126,116	0	21,320	0			0	0	0	104,796	83,837	20,959
1-D COUNSELING - DEPENDENT	1,134,760	0		0	29,537	0	0	0	0	1,105,223	884,178	221,045
	14,953	0		0	0	0	0	0	0	14,953	11,962	1,991
I-F DAY CARE	63	0		0	0	0	0	0	0	63	000	13
1-G DAY TREATMENT - DEPENDENT	0 0 0	0		0	0	0	0	0	0	0	0 020) 1	0 7
I-H DAY IREAIMENI - DELINQUENI	21,213	0		0	0	0	0	0	0	21,213	0/6,91	4,243
	103 355	0		0 699 61	0 0	0	0	0		83 686	66 949	16 737
	0	0		0	0	0	0	0	0	0	0	0
1-L LIFE SKILLS - DELINOUENT	0	0		0	0	0	0	0	0	0	0	0
	359,424	0		67,536	0	0	0	0	0	291,888	233,510	58,378
1-N PROTECTIVE SERVICE - GENERAL	1,448,772	0		125,130	0	0	0	0	0	1,323,642	1,058,914	264,728
1-O SERVICE PLANNING	164,877	0		29,947	0	0	0	0	0	134,930	107,944	26,986
1-P JUVENILE ACT PROCEEDINGS - DEPENDENT	41,609	0		0	0		0	0	0	41,609	20,805	20,804
JUVENILE AC	0	0			0		0	0	0	0	0	0
1-R SUBTOTAL IN-HOME	4,739,386	0	677,819	257,193	29,537	0	0	0	0	3,774,837	3,013,960	760,877
COMMUNITY BASED	TOTAL	PROGRAM	TITLE IV-E	TITLE IV-E			. H	Child Welfare Demonstration	MEDICAL	NET REIMBURSABLE	STATE	LOCAL
2-A ALTERNATIVE TREATMENT - DEPENDENT	EAFEINDII URES	INCOME	MAINTENANCE	ADMIN.	IANF	111LE AA	111LE IV-B	Project Title IV-E	ASSISTANCE 0	EAFENDITURES 0	AC1 148	SHAKE 0
2-B ALTERNATIVE TREATMENT - DELINOUENT	0	0	0	0		0	0	0	0	0	0	0
2-C COMMUNITY RESIDENTIAL - DEPENDENT	16,537	0	0	3,146		0	0	0	0	13,391	10,713	2,678
2-D COMMUNITY RESIDENTIAL - DELINQUENT	17,967	0	0	0		0	0	0	0	17,967	14,374	3,593
2-E EMERGENCY SHELTER - DEPENDENT	36,858	0	4,759	6,217	0	0	0	0	0	25,882	23,294	2,588
2-F EMERGENCY SHELTER - DELINQUENT	0	0	0	901.031	0	0	0	0	0	0 0	0 021 227	0 000 011
2-G FOSIER FAMILY - DEFENDENT	6 573	18,914	102,772	109,128		0	0	0		591,463	4/3,1/0	118,293
2-I KINSHIP CARE - DEPENDENT	444,436	14,484	46,485	95,488		0	0	0	0	287,979	230,383	57,596
2-J KINSHIP CARE - DELINQUENT	0	0	0	0		0	0	0	0	0	0	0
2-K SUP. INDEPENDENT LIVING - DEPENDENT	73,604	443	0	0		0	0	0	0	73,161	58,529	14,632
SUP. INDEPENDE	0	0	0			0	0	0	0	0	0	0
2-M SUBTOTAL CBP	1,478,252	33,841	154,016	273,979	0	0	0	0	0	1,016,416	815,721	200,695
INSTITUTIONAL	TOTAL REIMBURSABLE EXPENDITURES	PROGRAM	TITLE IV-E MAINTENANCE	TITLE IV-E	TANF	TITLE XX	TITLE IV-B	Child Welfare Demonstration	MEDICAL	NET REIMBURSABLE EXPENDITIRES	STATE ACT 148	LOCAL
3-A JUVENILE DETENTION SERVICE		1,263			1=				0	278,147	139,074	139,073
3-B RESIDENTIAL SERVICE - DEPENDENT	281,533	9,892	90,416	17,843		36,827	24,215	0	0	102,340	61,404	40,936
3-C RES. SERVICE - DELINQUENT (NON YDC/YFC)	112,911	10,139	0	0		0	0	0	0	102,772	61,663	41,109
3-D SECURE RES. SERVICE (EXCEPT YDC)	25,982	398							0	25,616	15,370	10,246
3-E YDC SECURE	336,582	5,700								330,882	198,529	132,353
3-F SUBTOTAL INSTITUTIONAL	1,036,418	27,360	90,416	17,843	0	36,827	24,215	0	0	839,757	476,040	363,717
4 ADMINISTRATION	214,887	0	0		40,887	0	0	0	1,861	172,139	103,283	68,856
S TOTAL BEVENIES	7 468 043	106 19	157 751	280 002	70 537	26 877	24.215		1 861	\$ 803 140	4 400 004	1 304 145
	יברי,טטדי,	174,17	104,441	407,705	100,07	170,00	C14(F4	>	1,00,1	77,600,6	トンツ,ヘンエ,T	UF1,F/C,1

MIFFLIN COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2020 TO JUNE 30, 2021 AMENDED CY370 EXPENDITURE REPORT

MAJOR SERVICE CATEGORIES 8. COST CENTEDS			TO STORY	TOP IT CITE OF EVPENDITION	-							
COST CENTERS	-	2	3	4	S	9	7	∞	6	10	==	12
	WAGES AND	EMPLOYEE	-		PURCHASED	FIXED	TOTAL	Children Served	Children Served	Non- Reimbursable	Non-Reim. Purchased Serv/	Program Income related to all Non-
IN-HOME	SALARIES	BENEFITS 10 206		SUBSIDIES OPERATING	SERVICES	ASSETS	EXPENDITURES A0 357	(by county)	(Purchased)	Non PS\Sub.	Subsidies	Reimbursable
1-B ADOPTION ASSISTANCE	0		1 283 887	0,00	0	0	1.283.887	-	141	0	0	0
1-C SUBSIDIZED PERMANENT LEGAL CUSTODIANSHI				0	0	0	126,116	0	115	0	0	0
				0	1,134,760	0	1,134,760	0	303	0	0	0
1-E COUNSELING - DELINQUENT	0	0		0	14,953	0	14,953	0	7	0	0	0
1-F DAY CARE	0			0	361	0	361	0	4	0	298	0
1-G DAY TREATMENT - DEPENDENT 1 H DAY TREATMENT DELINOTENT	0	0		0	0 0	0	0 0	0	0	0	0	0
1-H DAT INEATIMENT - DELINÇUENT	0			0	0 0	0	0	0 0	0	0	0	0
1-1 INTAKE & REFERRAL	63.487	26.24		13.624	0	0	103.355	382	0	0	0	0
	0			0	0	0	0	0	0	0	0	0
1-L LIFE SKILLS - DELINQUENT	0	0		0	0	0	0	0	0	0	0	0
1-M PROTECTIVE SERVICE - CHILD ABUSE	210,923	92,740		55,822	0	0	359,485	357	0	19	0	0
1-N PROTECTIVE SERVICE - GENERAL	394,096			110,909	782,089	0	1,448,772	1,471	2,280	0	0	0
		-43		29,028	0	0	164,877	1,828	0	0	0	0
1-P JUVENILE ACT PROCEEDINGS - DEPENDENT	=			0	41,609		41,609	0	70	0	0	0
JUVENILE AC			⇟	0	0		0	0	0	0 ;	0	0
1-R SUBTOTAL IN-HOME	786,431	332,534	1,410,003	215,792	1,994,985	0	4,739,745			61	298	0
	LRCP =	Legal Represnet	ation for Children	LRCP = Legal Representation for Children in Placement = \$	0	Number of Children	en receiving only NON-PURCHASED IH Service	HASED IH Services	0			
	WACES	gai represietati	n ior Ciniaren	CONT — Legal Represhetation for Children 1001-Flacement —5	0			DAVC	Children	Non	Non Daim	Drown Income
COMMUNITY BASED	AND	EMPLOYEE			PURCHASED	FIXED	TOTAL	OF	Served	Reimbursable	Purchased Serv/	related to all Non-
PLACEMENT	SALARIES	BENEFITS	_	SUBSIDIES OPERATING	SERVICES	ASSETS	EXPENDITURES	CARE	(Purchased)	Non PS\Sub.	Subsidies	Reimbursable
2-A ALTERNATIVE TREATMENT - DEPENDENT	0			0	0	0	0	0	0	0	0	0
2-B ALTERNATIVE TREATMENT - DELINQUENT	0			0	0	0	0	0	0	0	0	0
2-C COMMUNITY RESIDENTIAL - DEPENDENT	10,205	3,64		2,689	0	0	16,537	0	0	0	0	0
2-D COMMUNITY RESIDENTIAL - DELINQUENT	0			0	17,967	0	17,967	113	3	0	0	0
2-E EMERGENCY SHELIER - DEPENDENT	11,060	4,94		4,251	16,600	0	36,838	173	/.	0	0	0
2-F EMERGENCY SHELLER - DELINQUENT	0 277 271	0 00 1/9		61 221	0 27 705	0	0 004 700	0 0 0 9	0	0 5	0 00770	0
2-0 FOSTER FAMILY - DEFENDENT	0 0			050	6323	0 0	604,709	0,400	- 1	0	074,7	0
2-1 KINSHIP CARE - DEPENDENT	89.939	32.536		23.911	299,926	0	446.312	5.469	35	9	1.870	0
2-J KINSHIP CARE - DELINQUENT	0			0	0	0	0	0	0	0	0	0
	0			0	73,604	0	73,604	365	1	0	0	0
2-L SUP. INDEPENDENT LIVING - DELINQUENT	0			0	0	0	0	0	0	0	0	0
2-M SUBTOTAL CBP	286,979	106,010	0	82,432	1,007,139	0	1,482,560	12,692	90	18	4,290	0
NOTE ELES N	WAGES	EMBI OVEE			PUPCHASED	FIVED	TOTAL	DAYS	Children	Non-	Non-Reim.	Non-Reim.
PLACEMENT	SALARIES			SUBSIDIES OPERATING	SERVICES	ASSETS	EXPENDITURES	CARE	(Purchased)	Non PS\Sub.	Subsidies	Income
3-A JUVENILE DETENTION SERVICE	0	-	_	0	279,410	0	279,410	167	8	0	0	0
3-B RESIDENTIAL SERVICE - DEPENDENT	8,172	2,892	0	19,653	250,830	0	281,547	666	9	14	0	0
3-C RES. SERVICE - DELINQUENT (EXCEPT YDC/YFC)	0			537	112,374	0	112,911	564	4	0	0	0
3-D SECURE RES. SERVICE (EXCEPT YDC) 3-F VDC SECTIRE	0	0	0	0	336 582	0	336,582	8/	1 5	0	0	0
3-F SUBTOTAL INSTITUTIONAL	8,172	2,89		20,190	1,005,178		1,036,432	2,429	24	14	0	0
4 ADMINISTRATION	56,708	24,608	0	133,571	0	0	214,887		214,887	0	0	0
5 TOTAL EXPENDITURES	1 138 200	466 044	1 410 003	451 985	4 007 302	0	7 473 624			03	4 588	O
	2,000,000,000	_	County Indirect Costs = \$		-action(t	,				3	2226	,

MIFFLIN COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2020 TO JUNE 30, 2021 AMENDED

SUMMARY OF EXPENSE AND EXPENSE ADJUSTMENTS

COST CEN	TER ITEMS		AS REPORTED PER CY370		INCREASE (DECREASE)		AS AMENDED PER CY370
Adoption Service		\$	40,357	\$	0	\$	40,357
Adoption Assistance			1,283,887		0		1,283,887
Subsidized Permanent Leg	gal Custodianship		126,116		0		126,116
Counseling	-		1,149,713		0		1,149,713
Day Care			361		0		361
Day Treatment			21,213		0		21,213
Homemaker Service			0		0		О
Intake and Referral			103,355		0		103,355
Life Skills			0		0		O
Protective Service - Child	Abuse		359,485		0		359,485
Protective Service - Gene	eral		1,448,772		0		1,448,772
Service Planning			164,877		0		164,877
Juvenile Act Proceedings			41,609		0		41,609
Alternative Treatment			0		0		O
Community Residential			34,504		0		34,504
Emergency Shelter			36,858		0		36,858
Foster Family			891,282		0		891,282
Kinship Care			446,312		0		446,312
Supervised Independent I	Living		73,604		0		73,604
Juvenile Detention Service			279,410		0		279,410
Residential Service			394,458		0		394,458
Secure Residential Service	e (Except YDC)		25,982		0		25,982
YDC Secure	` '		336,582		0		336,582
Administration			214,887		0		214,887
	Combined Total Expense		7,473,624		0	•	7,473,624
	Less Non-reimbursables		4,681		0		4,681
	Total Net Expense	\$	7,468,943	\$	0	\$	7,468,943
OBJECTS OF	EXPENDITURE		AS REPORTED PER CY370		INCREASE (DECREASE)		AS AMENDED PER CY370
Wages and Salaries		\$	1,138,290	\$	0	\$	1,138,290
Employee Benefits		Ψ	466,044	Ψ	o	4	466,044
Subsidies			1,410,003		0		1,410,003
Operating			451,985		Ö		451,985
Purchased Services			4,007,302		0		4,007,302
Fixed Assets			0		o		0
T Ecc T Esces	Combined Total Expense		7,473,624		0	•	7,473,624
	Less Non-reimbursables		4,681		0	•	4,681
	Total Net Expense	\$	7,468,943	\$	0	\$	7,468,943

SECTION 3

STATUS OF PRIOR ENGAGEMENT FINDING AND RECOMMENDATION

MIFFLIN COUNTY CHILDREN AND YOUTH AGENCY STATUS OF PRIOR ENGAGEMENT FINDING AND RECOMMENDATIONS

The prior report included the following finding:

<u>Finding - Mifflin County Children and Youth Agency Funds Were Commingled With</u> Funds in the County's General Fund

In our prior engagement report, for the fiscal years July 1, 2017 to June 30, 2019, we cited the agency for commingling agency funds with funds in Mifflin County's General Fund without maintaining a children and youth account balance.

During the conduct of our current engagement, we determined the issuance of a repeat finding is warranted since corrective actions were not developed and implemented.

SECTION 4

CURRENT ENGAGEMENT FINDING AND RECOMMENDATIONS

MIFFLIN COUNTY CHILDREN AND YOUTH AGENCY CURRENT ENGAGEMENT FINDING AND RECOMMENDATIONS

<u>Finding – Unresolved Prior Engagement Recommendations - Mifflin County Children</u> and Youth Agency Funds Were Commingled With Funds in the County's General Fund

<u>Condition</u>: In our prior engagement report, for the fiscal years July 1, 2017 to June 30, 2019, we cited the agency for commingling agency funds with funds in Mifflin County's General Fund without maintaining a children and youth account balance.

During our current engagement period, the agency did not implement policy and procedures to ensure that funds for the provision of children and youth services are accounted for separate from other county funds.

<u>Criteria</u>: Good business practices and an adequate system of internal controls include accounting for assets, liabilities, revenues, and expenditures in sufficient detail to prepare relevant financial reports efficiently and effectively, and the commingling of funds and related revenues and expenditures for which separate reporting is required represents a deficiency in the system of internal controls.

55 Pa. Code Chapter 3140. Planning and Financial Reimbursement Requirements for County Children and Youth Social Service Programs:

• Section 3140.21. Reimbursement for Services. General. "(a) Under section 704.1 of the Public Welfare Code (62 P.S. § 704.1), the Department reimburses expenses incurred by the county for children and youth social services, including services to alleged and adjudicated dependent and delinquent children according to an approved county plan and budget estimate up to the amount of State funds allocated to the county under section 709.3 of the Public Welfare Code (62 P.S. § 709.3)."

Children, Youth and Families Bulletin 3140-18-01: Fiscal Year 2016-2017 Act 148 Invoicing & Medicaid Invoicing Procedures for County Child Welfare Services – Instructions for Completion of County Children and Youth Social Service Programs Expenditure Report:

This is a report of actual expenditures of the County Children and Youth Agency categorized for all services, into specific cost centers by intermediate object of expenditures.

55 Pa. Code §3170. Allowable Costs and Procedures for County Children and Youth:

Section 3170.11(b). Purpose. "The Department will only participate in expenditures or activities which are permitted under the County Code (16 P.S. § § 101-2902) applicable to the particular county requesting reimbursement. The Department will participate financially in the payment of those expenditures which are necessary and justifiable for program operation..."

MIFFLIN COUNTY CHILDREN AND YOUTH AGENCY CURRENT ENGAGEMENT FINDING AND RECOMMENDATIONS

Section 3170.11(e). Purpose. "This chapter shall apply to county children and youth social services agencies in the Commonwealth, and providers of service to the county agencies, where applicable."

Section 3170.105. Earned Interest. "Interest earned by the county on Departmental funds shall be considered as other income to reduce total expenditures in arriving at eligible expenditures for Departmental participation. However, since interest is considered a legitimate revenue of the county, it is available for use by the county to increase the level of service provided. Interest cannot be used to offset the county's matching share, to fund non-children and youth related services, or county general expenses..."

<u>Cause</u>: Agency management stated the County's accounting system was not compatible with the agency accounting system and the funds were not separated within the County's General Fund to enable the County to maintain a separate balance for Children and Youth funds. Agency management added that the County is in the process of establishing a separate fund and the County currently tracks income and expenses separately through project codes and organization/object codes through the MUNIS accounting system and that the agency is an isolated department.

<u>Effect</u>: The commingling of funds increases the risk of expending funds restricted for the provision of children and youth services on unrelated purposes and of interest earned on the restricted funds not being allocated to and expended for authorized children and youth services.

<u>Recommendations</u>: Mifflin County management should develop and implement internal controls to ensure that funds for the provision of children and youth services are accounted for separate from other county funds. This should include the maintenance of a separate fund or accounting balance for children and youth funds, allocation of interest earned on the balance to the balance, and expenditure of interest earned solely for authorized children and youth services.

Agency Representative Response: The County and children and youth agency are currently in discussions to separate children and youth funds from the County General Funds.

<u>Auditor's Conclusion</u>: We will follow up with agency management, during our next engagement, to determine whether children and youth funds are separated from the County General Funds and interest earned on the children and youth balance is used for authorized children and youth services.

SECTION 5

CURRENT ENGAGEMENT OBSERVATION

Observation – Despite the Pennsylvania Department of Human Services Apparent Strides in Increasing the Protection of At-Risk Children in the Care of Contracted In-Home Preventative Service Providers, DHS Failed to Review the Adequacy of the C&Y Agencies Procedures and Results for Ensuring these Providers Comply with CPSL Requirements

The vast majority of Pennsylvania's County Children and Youth (C&Y) agencies contract with non-government In-Home Preventative Service providers (contracted providers) to deliver services to children outside of an institutional or community-based setting, and those services are referred to as In-Home Purchased Services.² The Child Protective Services Law (CPSL) requires the conduct of Criminal Background Checks and Child Abuse History Clearances (certifications) for all contracted providers' (and their respective subcontractors') employees and direct volunteers.³

Since 2016, we have communicated concerns to the Pennsylvania Department of Human Services (DHS) that these contracted providers were not being monitored for compliance with the CPSL certification mandates. Specifically, this needed monitoring relates to obtaining assurance as to the sufficiency of each C&Y agency's procedures for reviewing the certifications of contracted providers' employees and volunteers and their respective subcontractors, whose duties require them to come into direct contact with children and taking appropriate corrective actions when disqualifying incidents are identified. Furthermore, these contracted providers are not subject to licensure nor annual inspections under the Human Services Code (Code). Our concerns continue to be communicated through the inclusion of a standardized observation in our C&Y Program engagement reports and through correspondence with DHS.

In February 2018, DHS senior management staff affirmed that DHS is responsible for communicating contract-monitoring expectations to the C&Y agencies and for implementing a method to ensure certification monitoring is being performed adequately. DHS staff also stated these expectations were communicated to C&Y agencies on numerous occasions since 2016.

² Institutional and community-based settings are those in which the child is outside of the home for the entire time (e.g., Juvenile Detention, Residential Services, Secure Residential, Youth Development Camps, Youth Forestry Camps, Foster Care, Emergency Shelter, Group Homes, etc.). In-Home supportive services are provided while the child is in their own home or supportive services provided to the child or child's family while the child is in substitute care.

³ 23 Pa.C.S. §§ 6344 and 6344.2. Please note that CPSL 23 Pa.C.S. § 6344.4 now requires recertification of the required state and federal background checks and the child abuse clearance every 60 months.

⁴ Based on a recent communication with DHS in early September 2020, the state agency candidly indicated that it lacks sufficient budgetary resources, leading to inadequate staffing to provide for the licensure and inspection of these contracted providers, which includes a large population of not only these providers, but also their subcontractors. Further, the implication of these budgetary constraints is that it would not be reasonable to pursue or support related legislation to make these contracted providers and their subcontractors subject to licensure and inspection. Please see the Special Note in Endnote 1.

Our 2018 Position Statement Letter

On March 18, 2018, we sent a Position Statement Letter to then DHS Deputy Secretary for Children, Youth and Families, which was also delivered to the Pennsylvania Senate and House of Representatives' children and youth committee chairs. The major purpose of our letter was to express our concerns, as detailed above.

DHS Corrective Actions Taken

In an effort to further address our concerns, DHS expanded its CPSL adherence requirements for C&Y agencies through the issuance of its 2019 revision of its Single Audit Supplement (supplement) for counties, effective for the fiscal year ended June 30, 2019. The supplement included the following requirements for C&Y agencies and their auditors who conduct Single Audits of counties.

C&Y agencies are required to:

- Monitor contracted provider adherence to the CPSL background check requirements to assure the safety of children receiving prevention, reunification, and aftercare services (services coded as in-home).
- Document these efforts and report them to DHS on a supplemental schedule included in each counties' Single Audit package.
- Create a listing of contracted providers that deliver in-home coded services.
- Monitor a sample of contracted providers' compliance with the CPSL requirements, including checking for incidents since the date of the background clearances.
- Communicate any violations to contracted providers and obtain a corrective action plan.
- Follow-up on implementation of the corrective action plan within six months.
- Document the results of the monitoring.

As part of the Single Audit, the auditors are required to perform agreed-upon procedures with regard to the supplemental schedule noted above, including the following:

- Obtain a listing of contracted providers that deliver in-home coded services for the C&Y agency.
- Test the listing of contracted providers for completeness.
- Analyze the C&Y agency's documentation of monitoring activities for adequacy of
 monitoring, the C&Y agency's obtaining of any necessary corrective action plans, the
 C&Y agency's timely follow-up on corrective action plans, and the adequacy and
 accuracy of the monitoring documentation as represented on the supplemental schedule.
- Disclose any exceptions or findings within the Single Audit package for items not reflected on the supplemental schedule.

Our Current Position

We believe that the requirements that DHS included in its supplement are great first steps in obtaining assurance of the C&Y agencies' compliance with the CPSL certification requirements. Specifically, having independent auditors reviewing the adequacy of the C&Y agencies' monitoring of the CPSL background check requirements for contracted providers annually, and reporting the C&Y agencies' monitoring efforts in a supplemental schedule of the Single Audit package that is provided to DHS appears to be effective. As part of the CPSL certification monitoring process, it is incumbent upon DHS to review the supplemental schedule and any exceptions or findings within the Single Audit packages to ascertain whether the C&Y agencies are properly monitoring for CPSL certification requirements of its contracted providers. However, as of March 2021, DHS officials acknowledged that staff have not started reviewing the Single Audit packages for this purpose.⁵

This lack of review by DHS is especially concerning considering DHS as the oversight agency could remain unaware of improper monitoring being performed by a C&Y agency and/or non-compliance with the CPSL occurring despite receiving an audit report disclosing such information. Therefore, we believe that it is imperative that DHS review the Single Audit packages for CPSL compliance by the C&Y agencies in a timely manner.

Alternatively, DHS could implement its own monitoring process whereby it reviews the adequacy of each C&Y agency's monitoring to ensure the agency's contracted providers and their subcontractors complied with CPSL certification requirements. The process would include reviewing the corrective actions plans when disqualifying incidents were identified and verifying that the corrective action plans were implemented.ⁱ

Conclusion

As the oversight agency, it is our opinion that DHS should ensure that every C&Y agency and its respective contracted providers are actually adhering to the CPSL certification requirements. This specifically relates to obtaining assurance as to the adequacy of each C&Y Agency's procedures for reviewing the certifications of their contracted providers' employees and volunteers and their subcontractors (whose duties require them to come into direct contact with children) and taking appropriate corrective action when disqualifying incidents are identified. We continue to believe that these children remain particularly vulnerable because contracted in-home services are often times provided outside the presence and view of others.

⁵ DHS informed us that they merely verbally inquire about the status of C&Y agencies' respective corrective action plans during their monitoring process.

¹ Special Note: In marked contrast to contracted foster care parents/providers and day treatment centers/child residential facilities, as well as 12 other types of facilities and programs, these C&Y contracted providers are not subject to annual licensure and an inspection process in accordance with the Human Services Code (Code). As noted in an earlier footnote, DHS recently made the candid statement that it lacks sufficient budgetary resources, leading to inadequate staffing to provide for the licensure and inspection of these contracted providers.

Our Department understands and appreciates these budgetary difficulties and that it may not be practical, but it is definitely reasonable to have licensure and inspections under the Code for this very large population of these C&Y agencies' contracted providers and their subcontractors.

MIFFLIN COUNTY CHILDREN AND YOUTH AGENCY REPORT DISTRIBUTION LIST

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