AMENDED FISCAL REPORTS For Fiscal Years:

July 1, 2017 to June 30, 2018 July 1, 2018 to June 30, 2019

Wayne County Children and Youth Agency

May 2021



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

Independent Auditor's Report

The Commissioners of Wayne County Wayne County Courthouse 925 Court Street Honesdale, PA 18431

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 the Wayne County Children and Youth Agency (agency), legally known as Wayne County Children and Youth Services, for the purpose of ascertaining and certifying the actual Commonwealth expenditures incurred on behalf of children residing within the County for the fiscal years July 1, 2017 to June 30, 2018, and July 1, 2018 to June 30, 2019. The scope of our engagement was limited to the fiscal reports submitted to the Department of Human Services (DHS) as part of the Act 148 Invoice Packages for the fiscal years ended June 30, 2018, and June 30, 2019.

Preparation of the submitted fiscal reports, and compliance with children, youth, and families regulations, are the responsibility of agency management. 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 and 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.*), but 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 Wayne County.

We certify that 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 2017-2018 and 2018-2019 fiscal years based on the accrual basis of accounting.

<u>Independent Auditor's Report (Continued)</u>

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

- For the 2017-2018 fiscal year, our engagement resulted in two adjustments being made to the agency's submitted fiscal reports. These adjustments in total impacted the agency's Final Net State Share by decreasing agency expenditures by \$5,087 and decreasing non-reimbursable expenditures by \$14,602. Based on the application of the state participation rates, the two adjustments resulted in an amount due to the county totaling \$2,832. All adjustments are detailed in our amended fiscal reports for fiscal year 2017-2018, as included in Section 1 of this report.
- For the **2018-2019 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 Final Net State Share decreasing non-reimbursable expenditures by \$17,164. However, the adjustment did not impact the agency's Final Net State Share Payable because total expenditures exceeded the approved state allocation by \$10,298. All adjustments are detailed in our amended fiscal reports for fiscal year 2018-2019, as included in Section 2 of this report.

In addition, we found that the agency did not comply with the recommendations in the finding included in our prior engagement report, as detailed in Section 3 of this report. This resulted in the issuance of the following repeat finding, which is detailed in Section 4 of this report.

Finding – Lack of Internal Control Policies and Procedures to Reduce the Risk of Paying Overbillings or Fraudulent Billings Submitted by Contracted In-Home Purchased Service Providers

Furthermore, we updated our Child Protective Services Law Observation to include DHS corrective actions taken and our current position, as listed below and detailed in Section 5 of this report.

Observation – Pennsylvania Department of Human Services is Making Strides in Increasing the Protection of At-Risk Children in the Care of Contracted In-Home Preventative Service Providers; Risk that has been Further Exacerbated by the Current COVID-19 Crisis.

The results of our engagement procedures, as presented in this report, were discussed with County representatives and agency management at an exit conference held on April 14, 2021.

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 §

Independent Auditor's Report (Continued)

31.1 *et seq.*, you will be afforded the opportunity by Commonwealth DHS to appeal its settlement process decision.

We appreciate the cooperation, assistance, and courtesy granted our representatives by your officials and the staff of the Wayne County Children and Youth Agency. If you have any questions, please feel free to contact Tracie Fountain, CPA, Director, Bureau of Children and Youth Services Audits at 717-787-1159.

Sincerely,

April 22, 2021

Timothy L. DeFoor Auditor General

Timothy L. Detool

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BACKGROUND

The Department of the Auditor General 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 to determine 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." According to information provided by the Department of Human Services (DHS), Office of Children, Youth and Families (OCYF), the Wayne County Children and Youth Agency provided in-home and placement services to 1,744 children residing within the County during the 2018-2019 fiscal year. The Children and Youth Social Services Program is County-Administered and State-Supervised by DHS and thus, they are jointly responsible 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. 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.

As part of our engagement, we reviewed the County Children and Youth Agency's submitted fiscal reports, as referenced above, which are included in the Act 148 Invoice package. Specifically, we reviewed the final, cumulative 4th Quarter fiscal reports submitted to DHS, along with the County Children and Youth Agency's related financial records and supporting documentation, to determine whether the County Children and Youth Agency's actual, cumulative expenditures and revenues were properly reported to DHS for the respective fiscal years (FYs). Any variances identified between the submitted and actual costs and revenues required adjustments to these fiscal reports, and thus, our Amended CY-370 Expenditure Report, Amended CY-370A Revenue Report, and Amended CY-348 Fiscal Summary, resulting from our engagement procedures and included in this report for each fiscal year included in our engagement period, reflect the County Children and Youth Agency's actual related costs and revenues for those years. The reports also include the impact of those costs and revenues on the County Children and Youth Agency's corresponding Net State Shares.

SECTION 1

AMENDED FISCAL REPORTS

FOR THE FISCAL YEAR:

JULY 1, 2017 to JUNE 30, 2018

WAYNE COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2017 TO JUNE 30, 2018 AMENDED

COMPUTATION OF FINAL NET STATE SHARE

Approved State Allocation ¹			\$	3,229,682
Supplemental Act 148			_	0
Total State Allocation				3,229,682
State Share (CY348) ²	\$	3,155,335		
Less: Major Service Category Adjustment		0	_	
Net State Share			\$	3,155,335
Less: Expenditures in Excess of the Approved State Allo	ocation		_	0
Final Net State Share Payable ³			\$	3,155,335
Actual Act 148 Revenues Received ⁴			_	3,152,503
Net Amount Due County/(State) ⁵			\$_	2,832

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 audit adjustments are considered.

³ Final Net Share Payable is the net amount of reimbursable expenditures from Act 148 funds after audit 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.

WAYNE COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2017 TO JUNE 30, 2018 AMENDED CY348 FISCAL SUMMARY

	А	В	С	D	Ε	F	Ð	Н	I	J	K
							oralid Welfare				
	GRAND	PROGRAM	TITLE		TITLE	TITLE	Demonstration	MEDICAL	NET	STATE	LOCAL
	TOTAL	INCOME	IV-E	TANF	XX	IV-B	Project Title IV-E	Project Title IV-E ASSISTANCE	TOTAL	ACT 148	SHARE
NET CHILD WELFARE EXPENDITURES											
01. 100% REIMBURSEMENT	23,174	248	3,343	0	0	0	0	0	19,583	19,583	0
02. 90% REIMBURSEMENT	14,928	0	487	0	0	0	0	0	14,441	12,997	1,444
03. 80% REIMBURSEMENT	4,022,979	64,204	680,625	73,336	0	0	0	0	0 3,204,814 2,563,851	2,563,851	640,963
04. 60% REIMBURSEMENT	1,316,236	34,209	214,209	0	47,549	147,988	0	4,755	4,755 867,526 520,516	520,516	347,010
05. 50% REIMBURSEMENT	76,776	0	0	0	0	0	0	0	76,776	38,388	38,388
06. TOTAL NET CHILD WELFARE EXPEND.	5,454,093	98,661	898,664	73,336	47,549	147,988	0	4,755	4,755 4,183,140 3,155,335	3,155,335	1,027,805
YDC/YFC PLACEMENT COSTS											
07. 60% DHS PARTICIPATION	0	0							0	0	0
08. NON-REIMBURSABLE EXPENDITURES	12,594	0							12,594		12,594

09. TOTAL EXPENDITURES	5,466,687	98,661	898,664	98,661 898,664 73,336 47,549 147,988	47,549	147,988	
10. TOTAL TITLE IV-D COLLECTIONS	55,014						
11. TITLE IV-D Collections for IV-E Children	10,907						
12. STATE ACT 148 - ine 6	3,155,335						
13. STATE ACT 148 ALLOCATION	3,229,682						
14. ADJUSTED STATE SHARE (lower of 12 or 13)	3,155,335						
INVOICE AMENDED STATE SHARE (ACT 148) ACT 148 AMOUNT RECEIVED	3,155,335						

2,832

ADJUSTMENT TO STATE SHARE

4,755 | 4,195,734 | 3,155,335 | 1,040,399

WAYNE COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2017 TO JUNE 30, 2018 AMENDED CY370A REVENUE REPORT

MAJOR SERVICE CATEGORIES												
& COST CENTERS						REVENUE SOURCES	SOURCES				•	
	1	2	3	4	5	9	7	8	6	10	11	12
	TOTAL REIMBURSABLE	д	TITLE IV-E	Η			į	Child Welfare Demonstration	MEDICAL	NET REIMBURSABLE	STATE	LOCAL
IN-HOME 1-A ADOPTION SERVICE	EXPENDITURES 23 174	INCOME 248	MAINIENANCE	3 343	IANF	IIILE XX II	IIILE IV-B	Project Title IV-E	ASSISTANCE	EXPENDITURES 19 583	ACI 148	SHAKE
I-B ADOPTION ASSISTANCE	406.599		192.829	2.680			0	0	0	211.090	168.872	42.218
	I 63,637	0	15,413	0			0	0	0	48,224	38,579	9,645
1-D COUNSELING - DEPENDENT	240,432			0	37,849	0	0	0	0	202,583	162,066	40,517
1-E COUNSELING - DELINQUENT	194,923	0		0	35,487	0	0	0	0	159,436	127,549	31,887
1-F DAY CARE	0	0		0	0	0	0	0	0	0	0	0
I-O DAY TREATMENT - DELINOTENT	3,946			0	0 0	0 0	0	0	0	3.946	3.157	789
1-I HOMEMAKER SERVICE	338,701	5.50		49.972	0	0	0	0	0	283,229	226.583	56.646
1-J INTAKE & REFERRAL	920,951	12.536		135,919	0	0	0	0	0	772,496	617,997	154,499
1-K LIFE SKILLS - DEPENDENT	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	100,147	731		13,991	0	0	0	0	0	85,425	68,340	17,085
1-N PROTECTIVE SERVICE - GENERAL	758,508	9,523		110,580	0	0	0	0	0	638,405	510,724	127,681
1-O SERVICE PLANNING	91,338	1,098		13,536	0	0	0	0	0	76,704	61,363	15,341
1-P JUVENILE ACT PROCEEDINGS - DEPENDENT	50,276	0		0	0		0	0	0	50,276	25,138	25,138
1-Q JUVENILE ACT PROCEEDINGS - DELINQUENT	0	0		0	0		0	0	0	0	0	0
1-R SUBTOTAL IN-HOME	3,192,632	29,636	208,242	330,021	73,336	0	0	0	0	2,551,397	2,029,951	521,446
											=	
COMMUNITY BASED	TOTAL REIMBURSABLE		TITLE IV-E	TITLE IV-E				Child Welfare Demonstration	MEDICAL	NET REIMBURSABLE	STATE	LOCAL
2-A ALTERNATIVE TREATMENT - DEPENDENT	EXPENDITURES	INCOME	MAIN I ENANCE	ADMIN.	IANF	111LE XX 11	IIILE IV-B	Project Title IV-E	ASSISTANCE 0	EXPENDITURES 0	ACT 148	SHAKE
2-B ALTERNATIVE TREATMENT - DELINOLIENT	0	0	0	0		С	0	0	0	0	0	0
2-C COMMUNITY RESIDENTIAL - DEPENDENT	25,666	2.75	0	136		0	0	0	0	22,773	18,218	4,555
2-D COMMUNITY RESIDENTIAL - DELINQUENT	76,238		0	0		0	0	0	0	04,640	55,736	13,934
2-E EMERGENCY SHELTER - DEPENDENT	10,187	0	431	99	0	0	0	0	0	9,700	8,730	970
2-F EMERGENCY SHELTER - DELINQUENT	4,741	0	0	0	0	0	0	0	0	4,741	4,267	474
2-G FOSTER FAMILY - DEPENDENT	781,968	25,491	67,553	76,494		0	0	0	0	612,430	489,944	122,486
2-H FOSTER FAMILY - DELINQUENT	0	0	0	0		0	0	0	0	0	0	0
2-1 SUP. INDEPENDENT LIVING - DEPENDENT	14,925	0	0	783		0	0	0	0	14,142	11,314	2,828
SUP. INDEPENDE	5,000		0	139		0	0	0	0	4,261	3,409	852
2-K SUBTOTAL CBP	918,725	34,816	67,984	78,208	0	0	0	0	0	737,717	591,618	146,099
	TOTAL							Child Welfare		NET		
INSTITUTIONAL PI ACEMENT	KEIMBUKSABLE EXPENIUTI IPES	PROGRAM	MAINTENANCE	ADMIN	TANE	TITLE VV	TITTEIN	Demonstration	MEDICAL ASSISTANCE	KEIMBUKSABLE EYPENDITI IPES	SIAIE ACT 148	LUCAL
3-A ITIVENITE DETENTION SERVICE	26 500	+	MAINITENANCE	JE	ΗΞ		11771	Project line I v-E	O	26 500	13.250	13.250
3-B RESIDENTIAL SERVICE - DEPENDENT	380.160	480	137.727	530		0	82.504	0	0	158.919	95.351	63.568
3-C RES. SERVICE - DELINOUENT (NON YDC/YFC)	319,589	26.	0	0		47.549	65.484	0	0	180,411	108,247	72,164
3-D SECURE RES. SERVICE (EXCEPT YDC)	109'06	5,390							0	85,211	51,127	34,084
3-E YDC SECURE	0	0								0	0	0
3-F SUBTOTAL INSTITUTIONAL	816,850	32,015	137,727	530	0	47,549	147,988	0	0	451,041	267,975	183,066
AND THE STREET PROPERTY OF	300 202			0.0		•	•	٥		200	100000	101
4 ADMINISTRATION	525,886		2,194	75,952		0	0	0	4,755	442,985	762,791	177,1
5 TOTAL REVENUES	5,454,093	98,661	413,953	484,711	73,336	47,549	147,988	0	4,755	4,183,140	3,155,335	1,027,805

WAYNE COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2017 TO JUNE 30, 2018 AMENDED CY370 EXPENDITURE REPORT

MAJOR SERVICE CATEGORIES & COST CENTERS		ō	3JECTS OF	OBJECTS OF EXPENDITURE	æ							
	-	2	3	4	5	9	7	8	6	10	11	12
	WAGES	EMPLOYEE			PURCHASED	FIXED	TOTAL	Children Served	Children Served	Non- Reimbursable	Non-Reim. Purchased Serv/	Program Income related to all Non-
IN-HOME	SALARIES		SUBSIDIES	OPERATING	SERVICES	ASSETS	EXPENDITURES	(b	(P	Non PS\Sub.	Subsidies	Reimbursable
1-A ADOPTION SERVICE	15,600	5,064		1,887	536	87	23,174	25	Т	0	0	0
1-B ADOPTION ASSISTANCE	5,488	1,812	399,048	251	0	0	406,599	44	44	0	0	0
1-C SUBSIDIZED PERMANENT LEGAL CUSTODIANSE	Ш	0	63,637	0	0	0	63,637	0	9	0	0	0
1-D COUNSELING - DEPENDENT	0	0		0	240,432	0	240,432	0	140	0	0	0
	0	0		0	194,923	0	194,923	0	25	0	0	0
1-F DAY CARE	0	0		0	0	0	0	0	0	0	0	0
1-G DAY TREATMENT - DEPENDENT	0	0		0	0	0	0	0	0	0	0	0
1-H DAY TREATMENT - DELINQUENT	0	0		0	3,946	0	3,946	0	1	0	0	0
1-1 HOMEMAKER SERVICE	206,825	100,949		56,809	0	4,118	338,701	157	0	0	0	0
1-J INTAKE & REFERRAL	618,172	202,787		88,840	525	10,627	920,951	1,957	61	0	0	0
1-K LIFE SKILLS - DEPENDENT	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	62,808	22,017		8,978	5,750	594	100,147	23	23	0	0	0
1-N PROTECTIVE SERVICE - GENERAL	493,489	177,317		72,048	8,272	7,382	758,508	116		0	0	0
1-O SERVICE PLANNING	57,352	25,660		7,435	0	891	91,338	114	0	0	0	0
1-P JUVENILE ACT PROCEEDINGS - DEPENDENT				0	50,276		50,276	0	64	0	0	0
1-0 JUVENILE ACT PROCEEDINGS - DELINQUENT				0	0		0	0	0	0	0	0
1-R SUBTOTAL IN-HOME	1,459,734	535,606	462,685	206,248	504,660	23,699	3,192,632			0	0	0
	umber of Chile		INON vino	JRCHASED IN	only NON-PURCHASED IN-Home Services	2,997						
	WAGES	9						DAYS	Children	Non-	Non-Reim.	Program Income
COMMUNITY BASED	AND	,			PURCHASED	FIXED	TOTAL	OF	Served	Reimbursable	Pu	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	0	0
2-B ALTERNATIVE TREATMENT - DELINQUENT	0	0	0	0	0	0	0	0	0	0	0	0
2-C COMMUNITY RESIDENTIAL - DEPENDENT	0	0	0	1,064	24,602	0	25,666	172	2	0	0	0
2-D COMMUNITY RESIDENTIAL - DELINQUENT	0	0	0	0	76,238	0	76,238	447	2	0	0	0
2-E EMERGENCY SHELTER - DEPENDENT	0	0	0	467	9,720	0	10,187	26	10	0	0	0
2-F EMERGENCY SHELTER - DELINQUENT	0	0	0	0	4,741	0	4,741	22	1	0	0	0
2-G FOSTER FAMILY - DEPENDENT	123,529	66,795	0	72,903	516,786	1,955	781,968	9,565	57	0	0	0
2-H FOSTER FAMILY - DELINQUENT	0	0	0	0	0	0	0	0	0	0	0	0
2-I SUP. INDEPENDENT LIVING - DEPENDENT	0	0	0	14,203	722	0	14,925	0	-	0	0	0
SUP. INDEPENDE	0	0	0	5,000	0	0	5,000	0	0	0	0	0
2-K SUBTOTAL CBP	123,529	66,795	0	93,637	632,809	1,955	918,725	10,303	73	0	0	0
										;		;
	WAGES	THE CASE			CITO 4 TIO CITIC	GUZ	I + HOH	DAYS	Children	Non-	Non-Reim.	Non-Reim.
PLACEMENT	SAI ARIFS	BENIFFITS	STIPSTIPS	SUBSIDIES OPERATING	SERVICES	ASSETS	FYPENDITIBES	CARE	(Purchased)	Non PS/Sub	rurchased serv/	Frogram
3-A JUVENILE DETENTION SERVICE	0		0	0	26.500	0	26.500	62	5	0	0	0
3-B RESIDENTIAL SERVICE - DEPENDENT	0	0	0	7,143	373,017	0	380,160	1,892	7	0	0	0
3-C RES. SERVICE - DELINOUENT (EXCEPT YDC/YFC)	0	0	0	733	318,856	0	319,589	1.585	7	0	0	0
3-D SECURE RES. SERVICE (EXCEPT YDC)	0	0	0	586	90,015	0	90,601	328	3	0	0	0
3-E YDC SECURE	0	0	0	0	0	0	0	0	0	0	0	0
3-F SUBTOTAL INSTITUTIONAL	0	0	0	8,462	808,388	0	816,850	3,884	22	0	0	0
4 ADMINISTRATION	263,385	95,011	0	178,304	0	1,780	538,480			12,594	0	0
5 TOTAL EXPENDITURES	1.846,648	697.412	462.685	486.651	1.945.857	27.434	5.466.687			12.594	0	0
		County Indirect Costs = \$	ect Costs = \$									

WAYNE COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2017 TO JUNE 30, 2018 AMENDED

SUMMARY OF EXPENSE AND EXPENSE ADJUSTMENTS

			AS			AS
			REPORTED	INCREASE	A	MENDED PER
COST CEN	TER ITEMS		PER CY370	(DECREASE)		CY370
Adoption Service		\$	23,174	\$ 0	\$	23,174
Adoption Assistance			406,599	0		406,599
Subsidized Permanent Leg	gal Custodianship		63,637	0		63,637
Counseling	-		435,355	0		435,355
Day Care			0	0		0
Day Treatment			3,946	0		3,946
Homemaker Service			340,224	(1,523)		338,701
Intake and Referral			925,331	(4,380)		920,951
Life Skills			0	0		0
Protective Service - Child	Abuse		100,335	(188)		100,147
Protective Service - Gene	ral		761,320	(2,812)		758,508
Service Planning			91,689	(351)		91,338
Juvenile Act Proceedings			50,276	o o		50,276
Alternative Treatment			0	0		0
Community Residential			101,904	0		101,904
Emergency Shelter			14,928	0		14,928
Foster Family			783,716	(1,748)		781,968
Supervised Independent L	iving		19,925	0		19,925
Juvenile Detention Service			19,750	6,750		26,500
Residential Service			699,881	(132)		699,749
Secure Residential Service	e (Except YDC)		90,601	o o		90,601
YDC Secure			0	0		0
Administration			539,183	(703)		538,480
	Combined Total Expense	_	5,471,774	(5,087)		5,466,687
	Less Non-reimbursables	_	27,196	(14,602)		12,594
	Total Net Expense	\$_	5,444,578	\$ 9,515	\$	5,454,093
			AS			AS
			REPORTED	INCREASE	Α	MENDED PER
OBJECTS OF	EXPENDITURE		PER CY370	(DECREASE)		CY370
Wages and Salaries		\$	1,846,648	\$ 0	\$	1,846,648
Employee Benefits			697,412	0		697,412
Subsidies			462,685	0		462,685
Operating			488,146	(1,495)		486,651
Purchased Services			1,938,789	7,068		1,945,857
Fixed Assets			38,094	(10,660)		27,434
	Combined Total Expense	_	5,471,774	(5,087)		5,466,687
	Less Non-reimbursables	_	27,196	(14,602)		12,594
	Total Net Expense	\$_	5,444,578	\$ 9,515	\$	5,454,093

WAYNE COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2017 TO JUNE 30, 2018 ADJUSTMENT SCHEDULE

					1			1	
REPORT	REFEI	RENCE	ADJ.		ACD	REPORTED	INCREASE/		ADJUSTED
SCHEDULE	LINE	COLUMN	NO.	EXPLANATION OF ADJUSTMENTS		ADJUSTED	(DECREASE)		TOTAL
SCHEDULE	LINE	COLUMN	NO.	EAFLANATION OF ADJUSTMENTS	OK F	ADJUSTED	(DECKEASE)	 	IOIAL
				CY-370 Adjustments					
CY-370	2-G	4	1	Foster Family (Dep.) - Operating	\$	74,266	\$ (1,363)	\$	72,903
	3-B	4		Residential Service (Dep.) - Operating	\$	7,275	\$ (132)		7,143
	2-G	5		Foster Family (Dep.) - Purchased Services	\$	516,465	\$ 318		516,783
	3-A	5		Juvenile Detention - Purchased Services	\$	19,750			26,500
	1-I	6		Homemaker Service - Fixed Assets	\$	5,641	\$ (1,523)		4,118
	1-J	6		Intake & Referral - Fixed Assets	\$	15,007	\$ (4,380)		10,627
	1-M	6		Protective Service Child Abuse - Fixed Assets	\$	782	\$ (188)		594
	1-N	6		Protective Service General - Fixed Assets	\$	10,194	` '		7,382
	1-O	6		Service Planning - Fixed Assets	\$	1,242			891
	2-G	6		Foster Family (Dep.) - Fixed Assets	\$	2,658	\$ (703)		1,955
	4	6		Administration - Fixed Assets	\$	2,483	\$ (703)	\$	1,780
				Total Adjustment Amount			\$ (5,087))	
				To decrease expenditures by \$5,087 to include agency adjustments made to the expenditure ledger subsequent to the submission of the Act 148 Invoice to Commonwealth DHS.					
				Title 55 PA Code, Chapter 3170.95(a)(b)					
CY-370	4	10	2	Administration - Non-Reimbursable Non-PS/Sub.	\$	27,196	\$ (14,602)	\$	12,594
				To decrease non-reimbursable expenditures by \$14,602 to properly report the amount of indirect costs which exceed the 2% cost limitation maximum amout. Title 55 PA Code, Chapter 3170.60 OCYF Bulletin 00-95-12					

SECTION 2

AMENDED FISCAL REPORTS

FOR THE FISCAL YEAR:

JULY 1, 2018 to JUNE 30, 2019

WAYNE COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2018 TO JUNE 30, 2019 AMENDED

COMPUTATION OF FINAL NET STATE SHARE

Approved State Allocation ¹			\$	3,487,916
Supplemental Act 148				231,958
Total State Allocation				3,719,874
State Share (CY348) ²	\$	3,730,172		
Less: Major Service Category Adjustment		0	_	
Net State Share			\$	3,730,172
Less: Expenditures in Excess of the Approved State Allo	cation			10,298
Final Net State Share Payable ³			\$	3,719,874
Actual Act 148 Revenues Received ⁴				3,719,874
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 audit adjustments are considered.

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

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

No amount is due to the County or State because the Children and Youth Agency's expenditures exceeded the Total State Act 148 Allocation by \$10,298, as detailed on this page. While our adjustments resulted in a net increase of \$17,164 in expenditures for the agency for said fiscal year, as detailed on page 14 of this report, the agency cannot receive state reimbursement in excess of the Total State Act 148 Allocation. Thus, there is no impact on the Final Net State Share of Expenditures.

WAYNE COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2018 TO JUNE 30, 2019 AMENDED CY348 FISCAL SUMMARY

	A	В	C	D	Э	ĭ	G	Н	Ι	ſ	К
	GRAND	PROGRAM	TITLE		TITLE	TITLE	Child Welfare 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	12,998	89	1,549	0	0	0	0	0	11,381	11,381	0
02. 90% REIMBURSEMENT	5,173	0	55	0	0	0	0	0	5,118	4,606	512
03. 80% REIMBURSEMENT	4,385,685	73,730	605,095	73,336	47,549	0	0	0	3,585,975	2,868,782	717,193
04. 60% REIMBURSEMENT	1,590,193	29,103	121,924	0	0	147,988	0	1,921	1,289,257	773,554	515,703
05. 50% REIMBURSEMENT	145,229	1,531	0	0	0	0	0	0	143,698	71,849	71,849
06. TOTAL NET CHILD WELFARE EXPEND.	6,139,278	104,432	728,623	73,336	47,549	147,988	0	1,921	5,035,429	3,730,172	1,305,257
		. ⊢									
YDC/YFC PLACEMENT COSTS											
07. 60% DHS PARTICIPATION	138,897	5,012							133,885	80,331	53,554
08 NON-BEIMBLIRSABI E EXPENDITIBES	13 808	0							13 808		13.808
	000,61								2,000		000,01
09. TOTAL EXPENDITURES	6,291,983	109,444	728,623	73,336	47,549	147,988	0	1,921	5,183,122	3,810,503	1,372,619
10. TOTAL TITLE IV-D COLLECTIONS	82,787										
11. TITLE IV-D Collections for IV-E Children	17,648										
12. STATE ACT 148 - inc 6	3,730,172										
13. STATE ACT 148 ALLOCATION	3,719,874										
14. ADJUSTED STATE SHARE (lower of 12 or 13)	3,719,874										
INVOICE											
AMENDED STATE SHARE (ACT 148) ACT 148 AMOUNT RECEIVED	3,730,172										
ADJUSTMENT TO STATE SHARE	10,298										

WAYNE COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2018 TO JUNE 30, 2019 AMENDED CY370A REVENUE REPORT

MAJOR SERVICE CATEGORIES & COST CENTERS						PEVENTI	REVENITE COLLECES					
	-	2	3	4	5	9	7	8	6	10	11	12
	TOTAL	PROGRAM	TITLE IV-E	TITLE IV-E				Child Welfare Demonstration	MEDICAL	NET REIMBURSABLE	STATE	LOCAL
IN-HOME	EXPENDITURES		MAINTENANCE	ADMIN.	TANF	TITLE XX	TITLE IV-B	Project Title IV-E	ASSISTANCE	EXPENDITURES	ACT 148	SHARE
1-A ADOPTION SERVICE	12,998	89		1,549	0		0	0	0	11,381	11,381	0
1-B ADOPTION ASSISTANCE	416,359	0	200,253	668'5			0	0	0	210,707	168,566	42,141
1-C SUBSIDIZED PERMANENT LEGAL CUSTODIANSH	SH 58,932	0	15,796	14			0	0	0	43,122	34,498	8,624
1-D COUNSELING - DEPENDENT	301,512	0		0	62,455	0	0	0	0	239,057	191,246	47,811
1-E COUNSELING - DELINQUENT	143,863	0		0	10,881	0	0	0	0	132,982	106,386	26,596
1-F DAY CARE	0	0		0	0	0	0	0	0	0	0	0
1-G DAY TREATMENT - DEPENDENT	0	0		0	0	0	0	0	0	0	0	0
1-H DAY TREATMENT - DELINQUENT	7,208	0		0	0	0	0	0	0	7,208	5,766	1,442
1-I HOMEMAKER SERVICE	393,656	1,089		46,903	0	0	0	0	0	345,664	276,531	69,133
1-J INTAKE & REFERRAL	951,394	2,246		113,306	0	0	0	0	0	835,842	668,674	167,168
1-K LIFE SKILLS - DEPENDENT	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	102,922	136		11,134	0	0	0	0	0	91,652	73,322	18,330
	792,691	1,838		93,978	0	0	0	0	0	696,875	557,500	139,375
	69,444	205		8,290	0	0	0	0	0	60,046	48,759	12,190
_	009,69	0		0	0		0	0	0	009,69	34,800	34,800
1-Q JUVENILE ACT PROCEEDINGS - DELINQUENT	0	0		0	0		0	0	0	0	0	0
1-R SUBTOTAL IN-HOME	3,320,579	5,582	216,049	280,573	73,336	0	0	0	0	2,745,039	2,177,429	567,610
						-						
COMMUNITY BASED	TOTAL REIMBURSABLE	Ī	TITLE IV-E	TITLE IV-E				Child Welfare Demonstration	MEDICAL	NET REIMBURSABLE	STATE	LOCAL
PLACEMENT	EXPENDITURES	INCOME	MAINTENANCE	ADMIN.	TANF	TITLE XX	TITLE IV-B	Project Title IV-E	ASSISTANCE	EXPENDITURES	ACT 148	SHARE
	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	143,544		0	210		47,549	0	0	0	78,342	62,674	15,668
2-D COMMUNITY RESIDENTIAL - DELINQUENT	78,163	3,273	0	0		0	0	0	0	74,890	59,912	14,978
2-E EMERGENCY SHELTER - DEPENDENT	5,173	0	0	55	0	0	0	0	0	5,118	4,606	512
2-F EMERGENCY SHELTER - DELINQUENT	0	0	0	0	0	0	0	0	0	0	0	0
2-G FOSTER FAMILY - DEPENDENT	901,459	47,500	38,080	70,224		0	0	0	0	745,655	596,524	149,131
	0	0	0	0		0	0	0	0	0	0	0
2-1 SUP. INDEPENDENT LIVING - DEPENDENT	24,538	0	0	1,508		0	0	0	0	23,030	18,424	4,606
2-3 SOF. INDEPENDENT LIVING - DELINQUENT 3-K STIRTOTAL CRP	1 152 877	0 68 216	38.080	71 997	C	0 47 549	0	0 0	0	927 035	0 747 140	184 895
		21622			>	2	>	>			2. (1)	200
INSTITUTIONAL	TOTAL REIMBURSABLE	Ъ	TITLE IV-E	TITLE IV-E				Child Welfare Demonstration	MEDICAL	NET REIMBURSABLE	STATE	LOCAL
PLACEMENT	EXPENDITURES	INCOME	MAINTENANCE	ADMIN.	TANF	TITLE XX	TITLE IV-B	Project Title IV-E	ASSISTANCE	EXPENDITURES	ACT 148	SHARE
3-A JUVENILE DETENTION SERVICE	75,629	1,531							0	74,098	37,049	37,049
3-B RESIDENTIAL SERVICE - DEPENDENT	383,242	2,375	51,513	208		0	85,093	0	0	244,053	146,432	97,621
3-C RES. SERVICE - DELINQUENT (NON YDC/YFC)	275,652	11,386	0	0		0	62,895	0	0	201,371	120,823	80,548
	324,833	14,934							0	309,899	185,939	123,960
3-E YDC SECURE	138,897	5,012								133,885	80,331	53,554
3-F SUBTOTAL INSTITUTIONAL	1,198,253	35,238	51,513	208	0	0	147,988	0	0	963,306	570,574	392,732
4 ADMINISTRATION	606 466	408	408		20 203	0	0	0	1 921	533 934	092 062	213 574
	000,100								17,721	10000	000,000	10,012
5 TOTAL REVENUES	6,278,175	109,444	305,642	422,981	73,336	47,549	147,988	0	1,921	5,169,314	3,810,503	1,358,811

WAYNE COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2018 TO JUNE 30, 2019 AMENDED CY370 EXPENDITURE REPORT

MAJOR SERVICE CATEGORIES			30 310 31									
& COSI CENTERS	-	2	DECISOR 3	4	5	9	7	~	6	10	=	12
	WAGES	EMPLOYEE	·		PURCHASED	FIXED	TOTAL	Children	Children	Non- Reimbursable	Non-Reim. Purchased Serv/	Program Income
IN-HOME	SALARIES		SUBSIDIES	OPERATING	SERVICES	ASSETS	EXPENDITURES	(by county)	(Purchased)	Non PS\Sub.	Subsidies	Reimbursable
1-A ADOPTION SERVICE	8,294	2,800		1,760	0	144	12,998	27	0	0	0	0
1-B ADOPTION ASSISTANCE	1,837	902	413,790	26	0	0	416,359	45	45	0	0	0
1-C SUBSIDIZED PERMANENT LEGAL CUSTODIANSHI	0 11	0	58,815	117	0	0	58,932	0	8	0	0	0
1-D COUNSELING - DEPENDENT	0	0		0	301,512	0	301,512	0	144	0	0	0
1-E COUNSELING - DELINQUENT	0	0		0	143,863	0	143,863	0	30	0	0	0
1-F DAY CARE	0	0		0	0	0	0	0	0	0	0	0
1-G DAY TREATMENT - DEPENDENT	0	0		0	0	0	0	0	0	0	0	0
1-H DAY TREATMENT - DELINQUENT	0	0		0	7,208	0	7,208	0	2	0	0	0
1-1 HOMEMAKER SERVICE	232,596	122,022		36,733	0	2,305	393,656	176	0	0	0	0
1-J INTAKE & REFERRAL	628,727	229,051		87,567	1,376	4,673	951,394	2,543	16	0	0	0
1-K LIFE SKILLS - DEPENDENT	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	58,234	25,349		9,595	9,374	370	102,922	14	45	0	0	0
	512,563	198,177		76,245	1,815	3,891	792,691	156	18	0	0	0
1-0 SERVICE PLANNING	46,493	16,756		5,763	0	432	69,444	140	0	0	0	0
1-P JUVENILE ACT PROCEEDINGS - DEPENDENT				0	69,600		69,600	0	92	0	0	0
1-Q JUVENILE ACT PROCEEDINGS - DELINQUENT				0	0		0	0	0	0	0	0
1-R SUBTOTAL IN-HOME	1,488,744	594,861	472,605	217,806	534,748	11,815	3,320,579			0	0	0
Nu	umber of Child	dren receiving	only NON-PU	RCHASED IN	Number of Children receiving only NON-PURCHASED IN-Home Services	2,797					,	
	WAGES							DAYS	Children	Non-	Non-Reim.	Program Income
COMMUNITY BASED	AND	_		Older A dideo	PURCHASED	FIXED	TOTAL		Served	Reimbursable	Purchased Serv/	related to all Non-
2 A ATTERNATIVE TREATMENT DEBENDENT	SALAKIES	BENEFII	_	SUBSIDIES OPERATING	SEKVICES	ASSEIS	EXPENDITURES	CARE	(Purchased)	Non PS\Sub.	Subsidies	Kembursable
2-B AT TERNATIVE TREATMENT - DEFENDENT			0	0	0	0 0	0		0	0	0	0
2-C COMMUNITY RESIDENTIAL - DEPENDENT	0	0	0	8.083	135.461	0	143.544	802		0	0	0
2-D COMMUNITY RESIDENTIAL - DELINOUENT	0	0	0	339	77.824	0	78,163	44	3	0	0	0
2-E EMERGENCY SHELTER - DEPENDENT	0	0	0	833	4,340	0	5,173	62	9	0	0	0
2-F EMERGENCY SHELTER - DELINQUENT	0	0	0	0	0	0	0	0	0	0	0	0
2-G FOSTER FAMILY - DEPENDENT	158,232	69,549	0	84,263	587,679	1,898	901,621	10,571	64	0	162	0
2-H FOSTER FAMILY - DELINQUENT	0	0	0	0	0	0	0	0	0	0	0	0
2-I SUP. INDEPENDENT LIVING - DEPENDENT	0	0	0	24,176	362	0	24,538	365	1	0	0	0
SUP. INDEPENDE	0		0	0	0	0	0	0	0	0	0	0
2-K SUBTOTAL CBP	158,232	69,549	0	117,694	805,666	1,898	1,153,039	12,258	77	0	162	0
	WAGES							DAYS	Children	Non-	Non-Reim.	Non-Reim.
INSTITUTIONAL	AND	_			PURCHASED	FIXED	TOTAL	OF	Served	Reimbursable	Purchased Serv/	Program
PLACEMENT	SALARIES	BENEFITS	SUBSIDIES	OPERATING	SERVICES	ASSETS	EXPENDITURES	CARE	(Purchased)	Non PS\Sub.	Subsidies	Income
3-A JUVENILE DETENTION SERVICE	0	0	0	229	75,400	0	75,629	290	13	0	0	0
3-B RESIDENTIAL SERVICE - DEPENDENT	0	0	0	5,874	377,368	0	383,242	1,511	12	0	0	0
3-C RES. SERVICE - DELINQUENT (EXCEPT YDC/YFC)	0	0	0	0	275,652	0	275,652	266	7	0	0	0
3-D SECURE RES. SERVICE (EXCEPT YDC)	0	0	0	0	324,833	0	324,833	1,077	4	0	0	0
YDC SECT	0	0	0	0	138,897	0	138,897	253	3	0	0	0
3-F SUBTOTAL INSTITUTIONAL	0	0	0	6,103	1,192,150	0	1,198,253	4,128	39	0	0	0
4 Phylippin amon	201 000	000101		217 570	033	1 000	000			13 646		
4 ADMINISTRATION	503,123	101,029	O	213,338	800	1,862	620,112		620,112	13,040	0	0
5 TOTAL EXPENDITURES	1,950,101	765,439	472.605	555.141	2.533,122	15.575	6.291.983			13.646	162	0
	,	County Indirect Costs =	Port Costs = \$	142,319			ì					

WAYNE COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2018 TO JUNE 30, 2019 AMENDED

SUMMARY OF EXPENSE AND EXPENSE ADJUSTMENTS

COST CEN	TER ITEMS		AS REPORTED PER CY370		INCREASE (DECREASE)		AS AMENDED PER CY370
COST CEN	TER HENIS		PER C 13/0		(DECKEASE)		C13/0
Adoption Service		\$	12,998	\$	0	\$	12,998
Adoption Assistance			416,359		0		416,359
Subsidized Permanent Leg	gal Custodianship		58,932		0		58,932
Counseling			445,375		0		445,375
Day Care			0		0		0
Day Treatment			7,208		0		7,208
Homemaker Service			393,656		0		393,656
Intake and Referral			951,394		0		951,394
Life Skills			0		0		0
Protective Service - Child	Abuse		102,922		0		102,922
Protective Service - Gene	ral		792,691		0		792,691
Service Planning			69,444		0		69,444
Juvenile Act Proceedings			69,600		0		69,600
Alternative Treatment			0		0		0
Community Residential			221,707		0		221,707
Emergency Shelter			5,173		0		5,173
Foster Family			901,621		0		901,621
Supervised Independent Living			24,538		0		24,538
Juvenile Detention Service			75,629		0		75,629
Residential Service			658,894		0		658,894
Secure Residential Service	e (Except YDC)		324,833		0		324,833
YDC Secure			138,897		0		138,897
Administration			620,112		0		620,112
	Combined Total Expense	_	6,291,983		0	_	6,291,983
	Less Non-reimbursables	_	30,972		(17,164)	_	13,808
	Total Net Expense	\$_	6,261,011	\$	17,164	\$_	6,278,175
			AS REPORTED		INCREASE		AS AMENDED PER
OBJECTS OF EXPENDITURE			PER CY370		(DECREASE)		CY370
Wages and Salaries		\$	1,950,101	\$	0	\$	1,950,101
Employee Benefits		Ψ	765,439	Ψ	0	Ψ	765,439
Subsidies			472,605		0		472,605
Operating			555,141		0		555,141
Purchased Services			2,533,122		0		2,533,122
Fixed Assets			15,575		0		15,575
1 200 1 10000	Combined Total Expense	-	6,291,983		0	_	6,291,983
	Less Non-reimbursables	_	30,972		(17,164)	_	13,808
	Total Net Expense	\$_	6,261,011	\$	17,164	\$_	6,278,175

WAYNE COUNTY CHILDREN AND YOUTH AGENCY FOR THE PERIOD JULY 1, 2018 TO JUNE 30, 2019 ADJUSTMENT SCHEDULE

REPORT	REFE	RENCE	ADJ.		AS REPORTED	INCREASE/	ADJUSTED
SCHEDULE	LINE	COLUMN	NO.	EXPLANATION OF ADJUSTMENTS	OR ADJUSTED	(DECREASE)	TOTAL
CY-370	4	10	1	CY-370 Adjustment Administration - Non-Reimbursable Non-PS/Sub. To decrease non-reimbursable expenditures by \$17,164 to properly report the amount of indirect costs which exceed the 2% cost limitation maximum amout. Title 55 PA Code, Chapter 3170.60 OCYF Bulletin 00-95-12	\$ 30,810	\$ (17,164)	

SECTION 3

STATUS OF PRIOR ENGAGEMENT FINDING AND RECOMMENDATIONS

Finding – Lack of Internal Control Policies and Procedures to Reduce the Risk of Paying Overbillings or Fraudulent Billings by Contracted In-Home Purchased Service Providers (Unresolved)

In our prior engagement report, covering the July 1, 2014 to June 30, 2017 fiscal years, we cited the Wayne County Children and Youth Agency (agency) for a lack of internal control policies and procedures designed to sufficiently reduce the agency's risk of paying overbillings or fraudulent billings submitted by contracted In-Home Purchased Service providers.

During the conduct of our current engagement, we determined the agency improved fiscal-related monitoring and developed written policy and procedures, as of December 21, 2020. But, implementation of the new policies and procedures has not yet occurred. As a result, the agency's elevated risk of paying overbillings or fraudulent billings submitted by contracted In-Home Purchased Services providers continued to exist throughout both fiscal years included in our current engagement period.

Based on the results of the procedures performed during the conduct of our current engagement, we concluded that the issuance of a repeat finding is warranted since these control deficiencies, and corresponding risks, continued to exist during our current engagement period, from July 1, 2017 until June 30, 2019. Our repeat finding is included in the Current Engagement Finding and Recommendations section (Section 4) of this report.

SECTION 4

CURRENT ENGAGEMENT FINDING AND RECOMMENDATIONS

<u>Finding – Unresolved Prior Audit Recommendations – Lack of Internal Control Policies and Procedures to Reduce the Risk of Paying Overbillings or Fraudulent Billings by Contracted In-Home Purchased Service Providers</u>

<u>Condition</u>: As detailed in our Status of Prior Engagement Findings and Recommendations section (Section 3) of this report, the Wayne County Children and Youth Agency (agency) lacked internal control procedures designed to sufficiently reduce the risk of paying overbillings or fraudulent billings submitted by contracted In-Home Purchased Service providers. For contracted In-Home Fee-For-Service Purchased Service providers, as cited in the finding included in our prior engagement report, the agency could not provide evidence that substantiated the validity of the number of units invoiced for each individual listed on invoices submitted by these providers.

During the conduct of our current engagement period (i.e. from July 1, 2017 until June 30, 2019), we determined monitoring procedures continued to be performed by the agency that verified that the children listed on the invoices were authorized to receive services and record relevant dates, but these procedures did not sufficiently reduce the risk of paying overbillings or fraudulent billings submitted by contracted In-Home Purchased Service providers. As of December 21, 2020, agency management improved the fiscal-related monitoring policy by adding procedures for an agency Quality Assurance Program Specialist to perform annual reviews of In-Home providers' contact verification forms and client records and developed written fiscal-related monitoring policy and procedures. However, implementation of the newly developed procedures has not yet occurred.

<u>Criteria:</u> The following section of 55 Pa. Code Chapter 3140, Planning and Financial Reimbursement Requirements for County Children and Youth Social Service Programs:

Services 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 Human Services Code (62 P.S. § 709.3)."

• Office of Children, Youth and Families (OCYF) Bulletin 3140-06-06, applicable for fiscal year ended 6/30/2011; Bulletin 3140-11-02, applicable for fiscal year ended 6/30/2012; Bulletin 3140-13-01, applicable for fiscal year ended 6/30/2013; Bulletin 3140-13-05, applicable for fiscal year ended 6/30/2014: Act 148 Invoicing Procedures for County Child Social Services - Instructions for Completion of Expenditure Report.

This form is a report of the ACTUAL EXPENDITURES of the County Children and Youth Agency (CCYA). The following sections of 55 Pa. Code § 3170, Allowable Costs and Procedures for County Children and Youth:

The following sections of 55 Pa. Code § 3170, Allowable Costs and Procedures for County Children and Youth:

- Section 3170.2. Definitions. Program funded agency An agency whose total eligible expenditures are funded in a manner which is predetermined by the appropriate county authorities.
- Section 3170.23(a). Purchase of Service. Purchase of service funding may be by unit of service funding or by program funding.
- Section 3170.85. Responsibility of the County. "...the county executive officers shall be responsible for the effective execution of each purchase of service agreement..."
- Section 3170.91. County Responsibility. "The county is responsible for the general fiscal management of the county agency. This includes maintaining fiscal records of expenditures and revenues of the program, providing data for budgeting and expenditure reporting to the Department, monitoring the financial activities of the program, and other activities related to the fiscal operations of the program."
- Section 3170.92(b). Accountability for Expenditures for Clients. Records Maintenance. "County agencies shall maintain sufficient and appropriate records and data to justify payment for expenses by the Department. The local authorities or contractors shall maintain books, records, documents and other evidence and accounting procedures and practices, sufficient to reflect properly all direct and indirect costs of whatever nature claimed to have been incurred and anticipated to be incurred for funds supported by the Department and for which reimbursement is claimed..."

<u>Cause</u>: Agency management indicated that internal controls to address recommendations in the prior two audits were not implemented because there was turnover in both the C&Y Director and the Human Services Administrator positions resulting in the prior findings not being communicated to the new leadership team until our prior engagement exit conference held on May 16, 2019. Furthermore, implementation of these written policy and procedures, which were developed on December 21, 2020, was further hindered by the Covid-19 pandemic and the agency's resulting inability to perform on-site visits.

<u>Effect</u>: The agency's lack of implemented fiscal-related monitoring policies and procedures from July 1, 2017 until June 30, 2019, designed to reduce the risk of paying overbillings and/or fraudulent billings submitted by contracted In-Home Purchased Service providers, increased agency management's risk during this time period of:

- Failure to detect fraudulent or erroneous In-Home provider billings (invoices)
- Failure to prevent or detect improper payments for such invoices
- Inappropriately billing the Commonwealth DHS for such improper payments
- Receipt of Act 148 funds to which the agency may not be entitled

<u>Recommendation:</u> We recommend that agency management implement the agency's developed fiscal-related monitoring procedures and ensure these procedures are sufficient in reducing the agency's risk of paying overbillings and fraudulent billings submitted by contracted In-Home Purchased Service providers, including ensuring that the agency obtain reasonable assurance that contracted In-Home Purchased Services were actually provided for the number of units detailed for each individual listed on invoices submitted by Fee-For-Service providers.

We further recommend that agency management ensure that it:

- Notify agency staff responsible for reviewing and approving submitted In-Home Purchased Service providers' invoices for payment are made aware of the results of fiscal-related monitoring reviews of these providers and, for any such providers for which significant documentation deficiencies have been identified, the impact on the agency's review and approval process for these providers.
- Maintain sufficient evidence substantiating the results of all fiscal-related monitoring
 procedures performed to determine whether the services for which In-Home Purchased
 Service providers were paid were actually provided, and provided in adherence to DHS
 regulations and executed contract terms, and to reduce the risk of overbillings and
 fraudulent billings by contracted In-Home Purchased Service Providers going
 undetected.

Agency Response: Although Wayne County Children & Youth Services did not have an official internal control policy in place during the FY 2017-18 and FY 2018-19, the Agency followed a strict procedure to reduce the risk of overbilling or fraudulent billings by Contracted In-Home Purchased Service Providers. The procedures listed below were followed on a monthly basis during the audit timeframe, conducted by the Agency Quality Assurance (QA) Program Specialist.

- Maintained spreadsheets of all services including referral date, opening date, closure date; For services that received one-time payment, include on spreadsheet meeting date and payment invoice date
- Conducted monthly service review meetings to ensure appropriate goals, discussed progress, lack of progress, and any changes needed
- Reviewed weekly provider reports to ensure the goals were worked on
- Compared invoice to spreadsheets

If a discrepancy was found during this monthly procedure, the QA Program Specialist reported the discrepancy to the Executive Director. The QA Program Specialist then contacted the provider to discuss the discrepancy. If a discrepancy was found on a monthly invoice and the result was a change to the invoice, the rectification steps were documented on the incorrect invoice to show the error and an adjusted invoice was requested. Both invoices were then submitted to fiscal for payment.

This procedure was formalized in the policy referenced in the above finding. The policy also included provisions to allow the QA Program Specialist to conduct annual review [sic] of client records, contact verification forms, staff clearances, etc. both in-agency and on-site using a monitoring tool developed by the Agency. This policy was included in contracts with In-Home Purchased Service Providers for FY 20-21. Unfortunately, due to the COVID-19 pandemic, on-site reviews will be held virtually in Spring 2021 as well as the in-agency review. The Agency plans to amend the current policy to eliminate the need to conduct on-site reviews in FY 21-22 due to the pandemic as well as [use] advances in technology that would allow the QA Program Specialist to complete the monitoring virtually with the same level of integrity and validity.

Auditor's Conclusion: The procedures listed in the Agency Response section above verified that the children listed on the invoices are authorized to receive services and record relevant dates, but did not provide evidence that substantiated the validity of the number of units invoiced for each individual listed on invoices. We commend agency management on acknowledging the deficiencies that existed in their invoice review and approval process and their plans to improve their monitoring process for contracted In-Home Purchased Services providers, including their plans to revise their monitoring policy and procedures that will allow its QA Program Specialist to complete monitoring virtually with the same level of integrity and validity as a result of challenges due to the COVID-19 pandemic. During our next audit of the agency, we will determine whether the agency's monitoring process is sufficient in regards to reducing the agency's risk of overbillings and fraudulent billings submitted by contracted In-Home Purchased Services providers going undetected.

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.¹ 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.²

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).³ Our concerns have been, and 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 that the certification monitoring is being performed adequately. DHS staff also stated that DHS had communicated these expectations to the C&Y Agencies on numerous occasions since 2016.

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¹ 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.

² 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.

³ 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 the then DHS Deputy Secretary for Children, Youth and Families, which was also simultaneously delivered to the Pennsylvania Senate and House of Representatives' children and youth committee chairs focused on protecting the health, safety, and wellbeing of the children and youth receiving contracted in-home services across the Commonwealth. 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 has not started reviewing the Single Audit packages for this purpose.⁴

This lack of review by DHS, as the oversight agency, is especially concerning considering DHS could remain unaware, despite receiving an audit report with the information, of a C&Y Agency failing to identify disqualifying incidents and/or take appropriate corrective actions when disqualifying convictions that would prohibit employees, volunteers, and subcontractors from having direct contact with children receiving services were identified. 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 the procedures each C&Y Agency has implemented related to ensuring its Contracted Providers and their subcontractors are complying with CPSL certification requirements and evaluate the results the C&Y Agencies found, including reviewing the corrective actions plans when disqualifying incidents were identified and verifying that the corrective action plans were implemented.ⁱ

Conclusion

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As the oversight agency, it is our opinion that DHS should ensure that every C&Y Agency and their 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

⁴ DHS informed us that they merely verbally inquire about the status of C&Y agencies' respective corrective action plans during their monitoring process.

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 oftentimes provided outside the presence and view of others.

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.

¹ <u>Special Note</u>: 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.

WAYNE COUNTY CHILDREN AND YOUTH AGENCY DISTRIBUTION LIST

This report was originally distributed to the following:

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Commonwealth of Pennsylvania

The Honorable Teresa D. Miller

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Department of Human Services

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