



Dave Yost • Auditor of State



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INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

The Board of County Commissioners
Trumbull County
160 High, N.W.
Warren, Ohio 44481

We have performed the procedures enumerated below, with which the Board of County Commissioners and the management of Trumbull County (the County) agreed, solely to assist the County in evaluating disbursements recorded in their cash-basis accounting records for the Non-Emergency Transportation Services (NET) and Temporary Assistance to Needy Families (TANF) transportation programs administered by the Trumbull County Job and Family Services (TCDJFS) and as they specifically relate to the services provided by Garwin, Inc. and All American USA Taxi for the period January 1, 2011 through December 31, 2011. Management is responsible for recording transactions; and management and the County are responsible for complying with the compliance requirements. This agreed-upon procedures engagement was conducted in accordance with the American Institute of Certified Public Accountants' attestation standards and applicable attestation engagement standards included in the Comptroller General of the United States' *Government Auditing Standards*. The sufficiency of the procedures is solely the responsibility of the parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

This report only describes exceptions exceeding \$10.

Definitions:

Non-Emergency Transportation (NET) is defined as transportation for non-emergency purposes for eligible and approved Medicaid recipients who have no other means of transportation to and from authorized Title XIX Medicaid Providers or Managed Care Providers providing Medicaid-reimbursable services. To be eligible, the individual must: (1) be a Medicaid recipient with no other means of transportation; (2) reside in an independent-living arrangement in Trumbull County; and (3) complete an application for Non-Emergency Transportation (NET) with one of the transportation eligibility determiners at Trumbull County Jobs and Family Services prior to receiving transportation. Transportation will not be provided to individuals residing in hospitals, correctional facilities, nursing homes, or any other non-independent residential facilities.

Temporary Assistance to Needy Families (TANF) transportation is for TANF participants who have no other means of transportation necessary to prepare for, obtain, or retain employment. Transportation shall not be provided permanently; it shall be only short term until other transportation and/or employment arrangements can be made. These arrangements will be the responsibility of the participant. To be eligible, the individual must: (1) be a current or former TANF recipient whose assistance group's total gross income is below 150% of the Federal Poverty Guideline; (2) be a Trumbull County resident; (3) be employed, attending General Equivalency Diploma (GED) classes, attending post-secondary education, or attending an authorized work program activity; and (4) complete an application for Prevention, Retention and Contingency (PRC) with one of the eligibility specialists at TCDJFS and cooperate in establishing eligibility prior to being approved and receiving transportation.

Non-Payroll Cash Disbursements

1. We compared amounts in the contracts between TCDJFS and the service providers Garwin, Inc. and All American USA Taxi to the initial and any subsequent appropriations approved by the Board of County Commissioners.
 - We noted that all contracts were approved by the Trumbull County Commissioners and the initial and subsequent modification of the contract agreed to the Appropriation Resolutions passed by the Trumbull County Commissioners.
2. We obtained the County Vendor History Listing for the period January 1, 2011 to December 31, 2011 and compared total payments made to Garwin, Inc. and All American USA Taxi with final appropriations per contracts noted in number 1 above.
 - Results for GARWIN INC.: In reviewing the contracts, appropriations, purchase orders and amounts paid to Garwin Inc., we noted the amounts paid were within the appropriations and contracts approved by the Trumbull County Commissioners. Purchase Order amounts directly corresponded to the amounts approved by the Trumbull County Commissioners in the initial and subsequent appropriation amendments. Expenditures did not exceed purchase order amounts.
 - Results for ALL AMERICAN USA TAXI: In reviewing the contracts, appropriations, purchase orders and amounts paid to All American USA Taxi, we noted the amounts paid were within the appropriations and contracts approved by the Trumbull County Commissioners. Purchase Order amounts directly corresponded to the amounts approved by the Trumbull County Commissioners in the initial and subsequent appropriation amendments. Expenditures did not exceed purchase order amounts.
3. We randomly chose six invoices paid to Garwin Inc. and six invoices paid to All American USA Taxi from the County Vendor History Listing for the period January 1, 2011 to December 31, 2011 and performed the following:
 - For Non-Emergency Transportation, we selected five clients from each of the following months:
 - i. GARWIN INC. - We selected December 2010, May 2011, and July 2011.
 - ii. ALL AMERICAN USA TAXI - We selected November 2010, March 2011, and August 2011.
 - For Temporary Assistance to Needy Families we selected five clients from each of the following months:
 - i. GARWIN INC. - We selected November 2010, February 2011, and September 2011.
 - ii. ALL AMERICAN USA TAXI – We selected January 2011, April 2011, and August 2011.

For those services that pertain to the Non-Emergency Transportation (NET), we determined if:

- a. TCDJFS approved program applications were on file for each client. We inspected the EMT Program where the application is maintained. The EMT program is an internal program designed by TCDJFS employees who administer the program.
 - i. We noted one client had no application on file covering the sample date of May 18, 2011. See Finding Number 2 at the end of this report.

Non-Payroll Cash Disbursements – (Continued)

- b. the client was Medicaid-eligible. TCDJFS employees searched the open CRIS-E system utilizing the assigned client case number to identify an open Medicaid (MA) benefit. Within the CRIS-E system, a TCDJFS employee can determine the number of Medicaid-eligible adults and each month a medical benefit was issued and if there is a spend down associated with any month in which a benefit has been paid. We scanned the CRIS-E system history to determine if the client was Medicaid-eligible.
 - i. We noted all clients were Medicaid eligible.
- c. the client did not own a vehicle or did not have a vehicle available in the household. We reviewed the CRIS-E system AERVH (a computer database which TCDJFS employees use to record whether the home of a client has a resource vehicle) and we accessed the Bureau of Motor Vehicles' (BMV) records by utilizing the "Drivers License Search" link on the TCDJFS Innerweb. TCDJFS maintains a Vehicle Statement Form for any client who has a vehicle registered within the household within their birthday year on the TCDJFS Innerweb under Internal Documents/Transportation. We inspected applicable Vehicle Statement Forms to determine the client did own or have a vehicle available in the household. We inspected the Vehicle Statement Form for documentation from the client's technician who services the vehicle to indicate the vehicle was not in operation.
 - i. We noted twenty-two clients did not have a vehicle available in the household and eight clients did own a vehicle.
 - ii. For the eight clients that did own a vehicle, we noted:
 - a. One client was disabled and could not drive;
 - b. One client had a thirty minute travel limitation by physician and traveled 62 miles to their destination;
 - c. One client provided a vehicle statement which reflected the vehicle was totally inoperable;
 - d. One client did not have a valid driver's license;
 - e. Four clients did not have a current vehicle registration.
- d. the client was on the approved listing provided by TCDJFS to the Service Providers. When a client is approved for the NET program, a copy of the 4074 Approval Notice Form is faxed to the Transportation Service Provider with a "Prior/Run Slip" which verifies the approved Medicaid providers to and from which transportation for the client can be provided. We determined whether the forms noted above were completed for the client.
 - i. We noted all clients were on the approved listing provided by TCDJFS to their respective Service Providers.
- e. a run sheet was filled out by the Service Providers and signed by an eligible client approved by TCDJFS. Run sheets are boxed and stored in the basement in the "Central Files" secure area. We inspected these run sheets to determine if a run sheet was maintained for each client selected.
 - i. We noted run sheets were missing for the three months of January 2011, February 2011, and March 2011. For the NET Program, we selected the month of March which had no original supporting run sheet documentation maintained at TCDJFS. Upon request by TCDJFS, All American USA Taxi provided copies of their missing run sheets which they had maintained as required by contract with TCDJFS. See Finding Number 1 at the end of this report.
 - ii. We noted one client did not sign the run sheet. However, this person's disability was a contributing factor to not signing.

Non-Payroll Cash Disbursements – (Continued)

- f. the run sheets provided by the Service Provider reflected the number of loaded miles. TCDJFS employees recheck the miles on the run sheets by using Google map which is on file at TCDJFS. We determined whether TCDJFS utilizes the Google Map on the internet by inspecting the printed map and information associated with the search which is attached to the original invoice from the Transportation Service Provider and scanned into the Service Provider's file under NET in the Fiscal Contracts imaging folder.
 - i. We noted a Unit Support Worker re-calculates approximately 10% of all clients billed in any invoice. Therefore, we used Google Map Search for twenty-six of thirty clients selected for NET.
 - ii. We noted All American USA Taxi billed for transporting a client 12 miles each way on November 13, 2010. However, our Google Map Search noted the maximum amount of miles reflected was 9.3 miles. Google Route defined as US-422 E. Division St. There were also two other results reflected in Google with fewer miles. In this instance, there was no supplemental information provided by All American USA Taxi with the invoice as required by contract should there be a deviation for the standard mileage. Therefore, we determined a 6 mile overcharge to TCDJFS for a dollar amount of \$13.50 (\$2.25/mile x 6 miles). See Finding Number 3 at the end of this report.
- g. run sheets were compared by TCDJFS employees to the appropriate entry on the Service Providers' monthly invoices. We inspected the client's run sheet to determine whether the run sheet supports the entry on the Service Provider's invoice.
 - i. We noted all run sheets supported the invoice. However, see Finding Numbers 1 and 3 at the end of this report.
- h. rates applied by the Service Providers, i.e. (All American USA Taxi and Garwin, Inc.) were accurate and in accordance with the contract provisions stated on EXHIBIT VII of each respective contract. We compared the rates applied on the invoice to the contract provision.
 - i. We noted the rates applied by the Service Providers were accurate and in accordance with the contract provisions.

For those services that pertain to the Temporary Assistance to Needy Families Transportation Program (TANF), we determined if:

- a. the client was eligible for PRC, (i.e. the client's income must be under the 150% Federal Poverty Level (FPL) and the client must have children or be complying with child support. The client must provide current income verification for the most recent 30 day period which TCDJFS employees compare to the income standard to determine program eligibility. The TCDJFS employees inspect the household composition to ensure children currently reside there. In the event that the client must comply with child support, the client provides documentation verifying compliance). We reviewed the income verification documents on file to determine eligibility.
 - i. We noted all clients were eligible.

Non-Payroll Cash Disbursements – (Continued)

- b. the client has only received two calendar months of travel per lifetime. Using transportation for three days in any one calendar month counts as a full calendar month. We reviewed the TANF Transportation Lifetime usage record for the period January 1, 2011 to December 31, 2011 to determine usage time. Beginning 07/01/2011, with the implementation of this guideline, an excel spreadsheet has been developed by TCDJFS to maintain the information on all clients who have utilized and/or are currently utilizing TANF transportation services. This spreadsheet, entitled "2 month clients", is located in a computer folder maintained by the TCDJFS Unit Support Workers.
 - i. We noted that prior to July 1, 2011, clients who had approved PRC applications were permitted four months of travel assistance. Beginning on or after July 1, 2011, clients who had approved PRC applications were permitted two months of travel assistance lifetime.
 - ii. Eight applications were dated after July 1, 2011. Of those, one had a month of travel assistance remaining as of September 30, 2011.
 - iii. Twenty-two applications were dated prior to July 1, 2011. All were permitted up to four months of travel assistance.
- c. the following documents were present in each client file: (1) referral for TANF Transportation Services, (2) notice of approval of the application for assistance, and (3) TANF Transportation guidelines had been signed by the client. All TANF transportation client documents are imaged in the TCDJFS' document imaging system under the specific client's name as individual documents as named above. We reviewed the imaged documents to determine if the required documents were maintained.
 - i. We noted all required documents were present in each client file.
- d. the client provided their weekly work schedule in advance to the Service Provider and the time the client was picked up agreed with the work schedule. The weekly transportation schedule is provided by the client to the unit support worker who documents the reported schedule and faxes it to the Transportation Service Provider. The schedule is then retained in the client's transportation file on the unit support worker's computer for a 1 year period after which it is document imaged. The unit support worker maintains these records according to Transportation Service provider. We compared the client's work schedule to the time the client was picked up as noted by the Service Provider.
 - i. We noted that all schedules were provided to the social worker in advance and then faxed by social worker to the appropriate Service Provider
 - ii. We noted all schedules provided to the Service Provider agreed in each case to the time the client was picked up.
- e. the client was on the approved listing TCDJFS provided to the Service Providers; All individual client's for whom invoicing is submitted is checked and verified for current eligibility and scheduling by TCDJFS employees. There is a random selection process used to verify the accuracy of the mileage invoicing. We reviewed the applicable approved listing to determine whether the client was eligible.
 - i. We noted an application with proper approvals was faxed to the appropriate Service Provider.

Non-Payroll Cash Disbursements – (Continued)

- f. the run sheets provided by a Service Provider reflected the number of loaded miles. TCDJFS employees recheck the miles on the run sheets by using the Google Map on the internet. We determined whether TCDJFS utilized the Google maps by inspecting the printed map and information associated with the search which is maintained in the Service Provider's file in the Fiscal Contracts imaging folder.
 - i. We noted a Unit Support Worker re-calculates approximately 10% of all clients billed in any invoice. Therefore, we used Google Map Search for twenty-seven of thirty clients selected for the TANF Transportation Services Program.
 - ii. We noted Garwin Inc. billed for transporting a client 8 miles each way on November 10, 2010. However, we performed a Google Map Search and noted the maximum amount of miles Google reflected was 4 miles. The Google Route was defined as N. Park Ave, Elm Rd NE and W. Market St. There were also two other results reflected in Google with fewer miles. There was no supplemental information provided by Garwin Inc. with the invoice as required by contract should there be a deviation for the standard mileage.
 - iii. We scanned the entire month of November 2010 and noted that Garwin Inc. billed an excess charge of 4 miles each way on 16 days and 4 miles on 2 separate days where the client only traveled one way. Therefore, we determined a 136 mile overcharge to TCDJFS [$128 (16 \times 8) + 8 (4 \times 2)$]. The total dollar amount of the overcharge is \$319.60 (136 miles x \$2.35 loaded mile rate). See Finding Number 4 at the end of this report.
- g. run sheets were compared and used to support the appropriate entry on the Service Providers' monthly invoice. Run sheets are included with the Service Provider's invoice and boxed and stored in the basement in the "Central Files" secure area. We reviewed central files for the client and compared run sheets to the monthly invoice charge.
 - i. We noted run sheets were missing for the three months of January 2011, February 2011 and March 2011. For the TANF Program, we selected the months of January (All American USA Taxi) and February (Garwin Inc). TCDJFS had no original supporting run sheet documentation for these months. TCDJFS contacted the Service Providers All American USA Taxi, Inc., and Garwin Inc. All American USA Taxi provided copies of their missing run sheets which they had maintained as required by contract with TCDJFS. However, Garwin Inc. did not maintain copies of the original run sheets. Instead, Garwin Inc. provided driver logs which did not reflect all the information a run sheet would, such as number of loaded miles and signatures of every client. See Finding Number 1 at the end of this report. We found no exceptions for run sheets selected in the other four months.
- h. run sheets provided by Service Provider reflected miles and was signed by client.
 - i. We noted run sheets were missing for the months of January 2011, February 2011, and March 2011. For the TANF Program, we selected January (All American USA Taxi) and February (Garwin Inc.).
 - ii. All American USA Taxi provided copies of their missing run sheets. The All American USA Taxi run sheets reflected miles and clients' signatures.

Non-Payroll Cash Disbursements – (Continued)

- iii. Garwin Inc. provided Daily Driver Logs for their missing run sheets. The Daily Driver Logs did not denote the number of loaded miles. One client did not sign the Daily Driver Logs. All other Garwin Inc. run sheets reflected loaded miles and clients' signatures.
- i. Rates applied by the Service Providers, (i.e. All American USA Taxi and Garwin, Inc.) were accurate and in accordance with the contract provisions stated on EXHIBIT VII of their respective contracts. The Unit Support worker who reviews the invoices is provided with a copy of the current rates and ensures that the invoiced rates are accurate. We reviewed the invoices for the accuracy of each billing entry for each client.
- i. We noted the rates applied by the Service Providers were accurate and in accordance with the contract provisions.

Findings

1. Destruction of Public Records

Ohio Rev. Code Section 149.351 requires that all records are the property of the public office and shall not be removed, destroyed, mutilated, transferred, or otherwise damaged or disposed of, in whole or in part, except as provided by Ohio Rev. Code Sections 149.38 through 149.42. **Ohio Administrative Code 5101:9-9-21 (5)(e)** County Agency Records Retention, Access, and Destruction, states in part that each county family services agency and workforce development agency shall retain financial, programmatic, statistical, and recipient records and supporting documents relating or pertaining to a federal award passed through from Ohio Department of Jobs and Family Services (ODJFS) for a minimum of three years after ODJFS's acceptance of a final closeout expenditure report for that federal award, or applicable ODJFS records retention requirements, whichever is longer. A Records Retention and Disposition Schedule has been adopted by the Trumbull County Records Commission on May 4, 2005, states in part that section 2005-34, Invoices, accounts payable invoices Bills for good shipped or services rendered. They are matched with purchase orders and delivery/shipping receipts, and attached to vouchers with payment. The schedule states that disposal is permitted three years after audited by the Auditor of State.

The Trumbull County Department of Jobs and Family Services (TCDJFS) lost, possibly shredded or misplaced three months of supporting documentation during 2011 (January, February and March) for the following transportation programs: (1) Temporary Assistance to Needy Families (TANF), (2) Non-Emergency Transportation (NET), and (3) Pregnancy Related Services (PRS). The documentation missing are run sheets which support all invoices from service providers for the aforementioned programs.

The TCDJFS had requested and received copies of the run sheets from All American USA Taxi, one of the Service Providers. However, GARWIN Inc., the other Service provider, did not maintain any runs sheets after they submitted the originals to the TCDJFS.

We recommend the Trumbull County Department of Jobs and Family Services ensure all records are adequately safeguarded and maintained according to Ohio Revised Code, Ohio Administrative Code, and Records Retention Schedules adopted in accordance with law.

Findings – (Continued)

Officials' Response

Trumbull County Department of Jobs and Family Services (TCDJFS) reviewed the issue of the failure of the Agency to appropriately safeguard said records. TCDJFS has taken action to re-organize its records and file room in order to ensure that all documentation which must be retained is properly labeled and stored in the designated area.

Additionally, TCDJFS is considering additional contractual language to ensure that service providers are also aware of their responsibility to appropriately retain all records, or copies when originals are submitted to TCDJFS, associated with service provisions. Any language changes will be reviewed with and approved by legal counsel.

2. Application Missing from File of Client

We haphazardly selected sixty clients to determine whether each client was eligible for the services provided by the Trumbull County Jobs and Family Services.

We noted that all sixty applicants selected were eligible for the service provided. However, of those sixty clients, one of the clients had no application on file covering the sample date of May 18, 2011.

Notes in the computer system state on December 16, 2010 the client began on Non-Emergency Transportation (NET) again and run sheets submitted by the Service Provider agree with that date. The Client was taken off NET and placed on travel through Pregnancy Related Services (PRS). The child was born on October 16, 2010. Two months after the birth of the child the client was placed back on NET December 16, 2010. The client would have stayed on PRS for two months after the child's birth and before being placed back on NET so it is plausible this was the case, however, there was no new application approving this client to be on NET beginning December 16, 2010 and going forward.

We recommend the Trumbull County Department of Jobs and Family Services ensure all proper authorizations and all appropriate paperwork be documented within each case file.

Officials' Response

The Director will be addressing the issue with Administration to be passed on to Staff.

3. Overpayment to Service Provider - All American USA Taxi

For the Non-Emergency Transportation (NET) Program, we haphazardly selected thirty clients from six separate invoices paid by TCDJFS to the two providers of taxi services to determine if the billings were appropriate. Of those thirty clients selected for the NET Program we noted the following:

We noted an overbilling for the selected date of November 13, 2010. The Provider - All American USA Taxi billed TCDJFS for transporting a client 12 miles each way on that date. The billing was supported by a run sheet which reflected 12 miles from origin to destination which was both ways the client traveled on that day.

Findings – (Continued)

We performed a Google map search for this particular trip and the maximum amount of miles Google reflected was 9.3 miles. The Google Route defined E. Division Street as US-422. There were also two other routes reflected in Google with less miles. By contract, a Service Provider must supply supplemental information with the original invoice explaining why the mileage was excessive. There was no supplemental information provided by All American USA Taxi with the invoice. Since the contract does not specify the shortest route must be taken, we rounded down to 9 miles each way. There was an excess charge consisting of three miles each way on this round trip for a total of 6 miles or \$13.50 which was paid by TCDJFS.

We recommend the TCDJFS request a reimbursement from All American USA Taxi in the amount of \$13.50.

Officials' Response

Trumbull County Department of Jobs and Family Services (TCDJFS) reviewed the issue of overbilling for the noted date. TCDJFS plans to take action to work with the service provider to recoup the overpaid funds.

4. Overpayment to Service Provider Garwin Taxi, Inc

For the Temporary Assistance to Needy Families (TANF) Program we haphazardly selected thirty clients from six separate invoices paid by TCDJFS to the two providers of taxi services to determine if the billings were appropriate. Of those thirty clients selected for the TANF Program, we noted the following:

We noted an overbilling for the selected date of November 10, 2010. The Provider - Garwin Inc, billed TCDJFS for transporting a client 8 miles each way on that date. The billing was supported by a run sheet which reflected 8 miles from origin to destination both ways the client traveled on that day.

We performed a Google map search for this particular trip and the maximum amount of miles Google reflected was 4 miles. The Google Route was defined as N. Park Ave, Elm Rd NE and W. Market St. There were also two other routes reflected in Google with less miles. By contract, a Service Provider must supply supplemental information with the original invoice explaining why the mileage was excessive. There was no supplemental information provided by Garwin Inc. with the invoice. Since the contract does not specify the shortest route must be taken, we used the largest amount of 4 miles each way. There was an excess charge consisting of four miles each way on 16 days and 4 miles on two separate days where the client only traveled one way. This amounted to a total of 136 miles [128 (16 days x 8 miles) + 8 (2 days x 4 miles)] overbilled by Garwin Inc. for this client for the month of November 2010. As a result, TCDJFS overpaid Garwin Inc. a total of \$319.60 based upon the loaded mile rate of \$2.35.

We recommend the TCDJFS request a reimbursement from Garwin Inc. in the amount of \$319.60.

Officials' Response

Trumbull County Department of Jobs and Family Services (TCDJFS) reviewed the issue of overbilling for the noted date. TCDJFS plans to take action to work with the service provider to recoup the overpaid funds.

Findings – (Continued)

5. The Prescribed Prevention, Retention and Contingency (PRC) Benefits Form

For the Temporary Assistance to Needy Families (TANF) Transportation Program, we haphazardly selected thirty clients on specific days from six separate invoices for two separate Providers of taxi services and determined if the clients were eligible. Of those thirty clients selected, we noted the following:

The Prevention, Retention and Contingency (PRC) Benefits Form is used to determine eligibility in the program. In four instances, we noted an inappropriate form was used. In each instance, the clients were eligible to receive benefits under the program but the forms used were different for each of the clients. In response to their calendar 2009 audit by Ohio Department of Jobs and Family Services (ODJFS), the Trumbull County Department of Jobs and Family Services (TCDJFS) filed an action plan with the Ohio Department of Jobs and Family Services stating they would begin to use the same form to determine eligibility from March 1, 2011 forward. Seventeen applications were received and approved prior to March 1, 2011 and of the remaining thirteen received and approved after March 1, 2011, four did not use the appropriate PRC Form.

The use of these different forms made it difficult and time-consuming to determine a client's eligibility. We recommend that TCDJFS use the same PRC Form to determine program eligibility.

Officials' Response

The Director will be addressing the issue with Administration to be passed on to Staff.

We were not engaged to, and did not conduct an examination, the objective of which would be the expression of an opinion on the Trumbull County Job and Family Services receipts, disbursements, balances and compliance with certain laws and regulations. Accordingly, we do not express an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of management, those charged with governance, and others within the County, and is not intended to be, and should not be used by anyone other than these specified parties.



Dave Yost
Auditor of State

May 1, 2012



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BOARD OF COUNTY COMMISSIONERS

TRUMBULL COUNTY

CLERK'S CERTIFICATION

This is a true and correct copy of the report which is required to be filed in the Office of the Auditor of State pursuant to Section 117.26, Revised Code, and which is filed in Columbus, Ohio.

Susan Babbitt

CLERK OF THE BUREAU

**CERTIFIED
AUGUST 14, 2012**