



**APPALACHIAN BEHAVIORAL HEALTHCARE
LIBERTY MANOR
COMMUNITY SUPPORT NETWORK**

AGREED UPON PROCEDURES

**FOR THE COST REPORTING PERIOD
JULY 1, 2009 THROUGH JUNE 30, 2010**



Dave Yost • Auditor of State

**APPALACHIAN BEHAVIORAL HEALTHCARE
LIBERTY MANOR COMMUNITY SUPPORT NETWORK**

TABLE OF CONTENTS

Title	Page
Independent Accountants' Report	1
Recommendation: Allocation of Administrative Costs	4
Appendix A: Actual Uniform Cost Report Adjustments – 2010	6

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Independent Accountants' Report on Applying Agreed-Upon Procedures

Dalon K. Myricks, Assistant Deputy Director & CFO
Ohio Department of Mental Health
30 East Broad Street, 11th Floor
Columbus, Ohio 43215-3430

Dear Mr. Myricks:

As required by Ohio Admin. Code § 5122-26-19 the Auditor of State's Office (AOS) performed the procedures enumerated below, codified in Ohio Admin. Code § 5122-26-19.1, Appendix A, Part G to which the Ohio Department of Mental Health (ODMH) also agreed. These procedures are designed to assist you in evaluating whether Appalachian Behavioral Healthcare: Liberty Manor Community Support Network (hereafter referred to as Liberty Manor CSN) prepared its Actual Uniform Cost Report (AUCR) for the periods July 1, 2009 through June 30, 2010, in accordance with the Uniform Cost Reporting Appendix to Ohio Admin. Code § 5122-26-19 and to assist you in evaluating whether expenditure transactions complied with 2 CFR Part 225 (OMB Circular A-87, *Cost Principles for State, Local, and Indian Tribal Governments*), and other compliance requirements described in the procedures below. Liberty Manor CSN's management is responsible for preparing these reports. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of ODMH. 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.

Throughout this report we identified and documented any variance greater than plus or minus two percent as material and obtained management's explanation of the variance(s) for inclusion in this agreed-upon procedures report. Our procedures and findings are as follows:

I. Mathematical Accuracy Testing

1.) We compared total disbursements on the FIN103 Expenditures by Department ID and Account report and allocated administrative disbursements from the HCM113 Civil Service Payroll Costs by CSN/Inpatient, Employee and Dept ID CF Detail report to total disbursements reported on the three Appalachian Behavioral Healthcare CSN AUCRs (Liberty Manor, Muskingum SMHS, and Country Garden) during State Fiscal Year (SFY) ending June 30, 2010.

Ohio Admin. Code § 5122-26-19(B) requires each CSN to prepare its AUCR in accordance with accounting principles generally accepted in the United States of America. However, the AUCRs reviewed for Liberty Manor CSN were prepared on a cash basis of accounting. This is a comprehensive basis of accounting other than accounting principles generally accepted in the United States of America. The AUCR omits accrued expenses that, while we presume to be material, the effect upon our testing of the procedures could not be determined.

We found no differences exceeding two percent.

2a.) We compared the sum of the totals reported on the AUCR for personnel and non-personnel costs with the amount reported on the AUCR for the total costs of each service.

We found no differences.

2b.) We compared the sum of the reported service total costs and allocation of administrative overhead from the AUCR with the value reported on the AUCR for total costs of each service.

We found no differences.

2c.) We compared the result of total costs divided by the number of units from the AUCR with the cost per unit reported on the AUCR for each service.

We found no differences.

2d.) We compared the difference of the value reported for total costs less unallowable costs from the AUCR with the value reported for total allowable costs on the AUCR for each service.

We found no differences.

2e.) We compared the result of reported allowable costs divided by the number of units served from the AUCR with the allowable cost per unit reported on the AUCR for each service.

We found no differences.

2f.) We compared the sum of the amount reported in each column, from the number of full-time equivalents (FTEs) assigned to the total allowable costs from the AUCR, with the total mental health services reported on the AUCR under each corresponding column.

We found no differences.

2g.) We compared the sum of the values reported under total mental health services, the values reported in the total agency service total and administrative overhead from the AUCR with the agency total costs reported on the AUCR under each corresponding column.

We found no differences.

II. Personnel Costs

1.) We compared total salaries, wages, and fringe benefits on the Ohio Administrative Knowledge System (OAKS) Recap by Staff by Cost Center report to total personnel costs reported on the Liberty Manor CSN's SFY 2010 AUCR.

We found no differences exceeding two percent.

2.) From the personnel costs reported on the AUCRs, we selected the yearly personnel costs for 10 employees for SFY 2010. We performed the following procedures on these samples by inspecting the supporting documentation (e.g., Recap by Cost Center Report, job descriptions, etc.).

2a.) We determined if supporting documentation for personnel costs was maintained as required by 2 CFR 225 (OMB Circular A-87, Appendix A, (C) (1)(J)) and properly classified as allowable or unallowable as defined in sections (1) and (2) of paragraph (H) of Ohio Admin. Code § 5122-26-19.

We found \$8,749 in employee salaries were overstated for one maintenance repair worker on Liberty Manor CSN's SFY 2010 AUCR. We reported these differences in Appendix A.

2b.) For any unallowable personnel disbursements we reviewed the AUCR to determine if they were included in unallowable costs.

We found \$7,847 in cost savings days that were allocated to CSN programs for unpaid employee furlough days for which there was not adequate supporting documentation to demonstrate a benefit to the CSN's programs; therefore, the cost was unallowable under 2 CFR Part 225, Appendix A, §§ (C)(3)(a) and (C)(1)(j). We reported this difference in Appendix A.

2c.) For any unallowable personnel disbursements we determined if they were allocated on the Budgeted Uniform Cost Report (BUCR) using the same cost methodology as they were allocated on the AUCR (e.g., number of FTEs).

We found no differences.

2d.) We reviewed supporting documentation to determine if personnel costs were properly allocated as direct service or support service costs and to the appropriate service(s) (e.g., pharmacological management) in accordance with the Uniform Cost Reporting Appendix to Ohio Admin. Code § 5122-26-19.

We found no differences.

III. Non-Personnel Costs

1.) From the non-personnel costs reported on the AUCR, we haphazardly selected 7 non-personnel disbursements in SFY 2010. We performed the following procedures on each selected disbursement:

1a.) We determined if each disbursement was properly classified as allowable or unallowable as defined in sections (1) and (2) of paragraph (H) of Ohio Admin. Code § 5122-26-19 and 2 CFR Part 225, Appendix A, (C)(1)(j) and Appendix B.

We found no differences.

1b.) We determined if the allocation method(s) used for the tested non-personnel disbursements complied with the procedures outlined in the Uniform Cost Reporting Appendix to Ohio Admin. Code Section 5122-26-19.

We found no differences.

1c.) For any unallowable non-personnel disbursements we determined if they were allocated on the Budgeted Uniform Cost Report (BUCR) using the same cost methodology as they were allocated on the AUCR (e.g., number of FTEs).

We found no differences.

IV. Administrative Overhead Costs

1.) ODMH requested us to haphazardly select the lesser of ten percent or twenty cash disbursements for SFY 2010 from the administrative overhead costs reported on the AUCR.

The SFY 2010 AUCR for Liberty Manor CSN did not include non-personnel administrative disbursements; however, it included personnel costs. Therefore, we compared the costs reported for all nine administrative cost centers reported on *Overhead Allocation Schedule* of the SFY 2010 AUCR to the costs reported on the *HCM113CSPCD (Civil Service Payroll Costs by CSN/Inpatient and Employee and Dept. ID)* report.

We found that on the *Overhead Allocation Schedule* Liberty Manor CSN allocated SFY 2009 hospital administrative overhead costs of Appalachian Behavioral Healthcare in lieu of actual SFY 2010 hospital administrative overhead costs.

We recalculated administrative overhead costs using actual SFY 2010 costs reported on the FIN 103 Expenditures by Department ID and Account report and allocated these costs to Liberty Manor CSN based on their percentage of Direct and Support FTEs. We recalculated the portion of the administrative overhead disbursements allocated to Liberty Manor CSN as \$91,689 and we found that administrative overhead costs of \$54,607 were underreported in SFY 2010. We reported these variances in Appendix A.

1a.) We determined if each disbursement was properly classified as allowable or unallowable as defined in sections (1) and (2) of paragraph (H) of Ohio Admin. Code § 5122-26-19 and 2 CFR Part 225, Appendix A, (C)(1)(j) and Appendix B.

We found no unallowable administrative overhead expenditures.

1b.) We determined if the allocation method(s) used for the tested administrative overhead disbursements were allocated using only one of the allowable methods described in the Uniform Cost Reporting Appendix to Ohio Admin. Code § 5122-26-19.

We found that Liberty Manor CSN used a percent of budget method to calculate the administrative overhead costs in SFY 2010 based on SFY 2009 costs (see Procedure 1) which is not an allowable allocation method for administrative overhead costs.

Recommendation:

We recommend that Liberty Manor CSN use one of the allowable allocation methods for administrative overhead costs as required by the Uniform Cost Reporting Appendix to Ohio Admin. Code § 5122-26-19(E) which states in pertinent part, "At this point, decide which allocation base will be used for the distribution of all administrative overhead costs across all services being expensed. The only acceptable allocation bases are: Service Total Costs, (column 6 of the UCR); Direct Service Personnel Costs, (column 4a of the UCR); Total Personnel Costs, (columns 4a plus 4b of the UCR); Total Direct Service FTEs (column 3a of the UCR); Total Direct and Support FTEs (columns 3a plus 3b of the UCR)." See Part III.E.3.

1c.) For any unallowable administrative overhead costs we determined if they were allocated on the BUCR using the same cost methodology as they were allocated on the AUCR (e.g., number of FTEs).

We found no unallowable administrative overhead expenditures.

V. Units of Service

1.) We compared the number of units on the AUCR with the Liberty Manor CSN units of service cross tab report to determine if units were reported in compliance with the Uniform Cost Reporting Appendix to Ohio Admin. Code § 5122-26-19.

The amount of residential care service units was overstated by 215 units. We reported this variance in Appendix A.

2.) From and by each service with costs reported on the AUCR, we haphazardly selected 42 units for SFY 2010. We performed the following procedures on the selected units:

2a.) We determined if supporting documentation for the units of service was maintained as required by the Uniform Cost Reporting Appendix to Ohio Admin. Code § 5122-26-19 and met the service documentation requirements of Ohio Admin. Code § 5101:3-27-02 and units of service conventions in Ohio Admin. Code § 5101:3-27-05.

- Date of service;
- Duration of the service contact;
- Unit of service convention (e.g., one hour of mental health assessment is one unit).

We did not identify any differences.

VI. BUCR to AUCR Comparison

1.) We compared each cost category on the BUCR against the AUCR and determined if the same cost methodology was used (e.g., number of FTEs).

We did not identify any differences.

We did not receive a response from officials to the exceptions noted above.

We were not engaged to and did not conduct an audit, the objective of which would be the expression of an opinion on the CSN's AUCR. Accordingly, we do not express such 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 use of the managements of the CSN, ODMH, the Ohio Department of Job and Family Services, and the Centers for Medicare and Medicaid Services and is not intended to be, and should not be used by anyone other than these specified parties.

Sincerely,



Dave Yost
Auditor of State

August 20, 2012

cc: Rick Thompson, Business Administrator, Appalachian Behavioral Healthcare
Jane Krason, Chief Executive Officer, Appalachian Behavioral Healthcare
Kelly Markins, Chief Operating Officer, Appalachian Behavioral Healthcare

Appendix A
 Liberty Manor Community Support Network
 For the AUCR Reporting Period from 7/01/2009 to 6/30/2010

2010 Worksheet/Schedule	Reported Original Amount on AUCR	Adjustment (s) Required	Final Adjusted Amount	Explanation of Adjustment
Liberty Manor CSN AUCR				
Schedule A-1				
Community Psychiatric Supportive Treatment (Ind.) (Ind. CSP)				
Column 7-\$ Allocation of Admin Overhead	\$ 6,373	\$ 9,386	\$ 15,759	CSN used the incorrect admin salary totals.
Column 10-Un-Allowable Costs	\$ -	\$ 1,308	\$ 1,308	To report unallowable Cost Savings Days.
Community Psychiatric Supportive Treatment (Gp.)(Gp. CSP)				
Column 7-\$ Allocation of Admin Overhead	\$ 302	\$ 445	\$ 747.00	CSN used the incorrect admin salary totals.
Column 10-Un-Allowable Costs	\$ -	\$ 64	\$ 64.00	To report unallowable Cost Savings Days.
Residential Care (Residential Treatment/Residential Support)				
Column 2-No. of Units	5,840	(215)	5,625	CSN used the incorrect unit total
Column 4-Personnel Costs (B)-Support Service	\$ 138,272	\$ (8,749)	\$ 129,523	Salary for an employee was incorrectly recorded
Column 7-\$ Allocation of Admin Overhead	\$ 30,407	\$ 44,776	\$ 75,183	CSN used the incorrect admin salary totals.
Column 10-Un-Allowable Costs	\$ -	\$ 6,475	\$ 6,475	To report unallowable Cost Savings Days.



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APPALACHIAN BEHAVIORAL HEALTHCARE: LIBERTY MANOR COMMUNITY SUPPORT NETWORK

MUSKINGUM 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
SEPTEMBER 25, 2012