



**TWIN VALLEY BEHAVIORAL HEALTHCARE  
TWIN VALLEY COMMUNITY SUPPORT NETWORK  
FRANKLIN COUNTY**

**AGREED UPON PROCEDURES**

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



**Dave Yost • Auditor of State**



**TWIN VALLEY BEHAVIORAL HEALTHCARE  
TWIN VALLEY COMMUNITY SUPPORT NETWORK**

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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 Twin Valley Behavioral Healthcare: Twin Valley Community Support Network (hereafter referred to as Twin Valley 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. Twin Valley 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 Twin Valley Behavioral Healthcare CSN's AUCR 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 Twin Valley 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.

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 Twin Valley 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 no differences exceeding two percent.

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

We found no unallowable personnel disbursements.

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 unallowable personnel disbursements.

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 40 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 § 5122-26-19.

We found \$52,343 in cost savings days that were allocated to CSN programs for unpaid employee furlough days in 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, Section (C)(3)(a) and (C)(1)(j). We reported this difference in Appendix A.

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.) From the administrative overhead costs reported on the AUCR, we haphazardly selected non-personnel disbursements for SFY 2010.

The SFY 2010 AUCR for Twin Valley CSN did not include non-personnel administrative disbursements; however, it included personnel costs. Therefore, we compared the costs reported for 13 administrative cost centers reported on *Schedule, Administrative Overhead Costs* of the SFY 2010 AUCR to the costs reported on HCM113CSPCD (Civil Service Payroll Costs by CSN/Inpatient and Employee and Dept. ID) report.

We found no differences.

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 administrative overhead disbursements were allocated using one of the allowable methods described in the Uniform Cost Reporting Appendix to Ohio Admin. Code § 5122-26-19.

We found no unallowable allocation methods.

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).

*Schedule A-4, Administrative Overhead Costs* was unavailable for SFY 2010 and was not examined.

## **V. Units of Service**

1.) We compared the number of units on the AUCR with the Twin Valley 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 CSN reported 2,080 units for forensic monitoring service on the AUCR by taking the total amount of the grant divided by the unit rate. The CSN did not track the number of units of forensic monitoring service provided. However, they could provide a forensic monitoring report of the number of consumers served. We reported these statistics in Appendix A.

2.) From and by each service with costs reported on the AUCR, we haphazardly selected 49.7 units of service 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 found that only four of eight jail psychiatric units provided for August 11, 2009 had supporting documentation.

The CSN stated the 8 hours reported for this date of service on the multi staff service history report was incorrect and only four hours of service was provided. However, the CSN also noted that the service is paid quarterly through a block grant program with the Franklin County Alcohol, Drug and Mental Health Board (ADAMH Board) based on actual costs of staff which includes admin overhead. The ADAMH Board only paid as much as was shadow billed (service time multiplied by service cost) and if the quarterly shadow billing exceeded actual staff time/costs, the extra amount would never be billed for reimbursement. Therefore, errors in over shadow-billing would not lead to requests for reimbursements we did not actually earn. This system was created by the ADAMH Board some years ago and changed due to some of these issues.

We reviewed the Claims Services and 837 Billed/835 ERA reports out of the MACSIS system provided by ODMH and although \$956.72 was billed no Medicaid payment was made. However, the ADAMH board should review this claim to determine if any overpayment was made.

## **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 in *Schedule A-1, Uniform Cost Report, Schedule A-2, Personnel Service Costs, Schedule A-3, Non Personnel Costs, and Schedule A-4, Administrative Overhead Cost. Schedule, Administrative Overhead Costs* for the BUCR, which supports Schedule A-4, was unavailable for SFY 2010.

We received a response from officials to the exceptions noted above under Units of Service (procedure 2a). We did not audit the response and, accordingly, we express no opinion on it.

We were not engaged to and did not conduct an audit, the objective of which would be the expression of an opinion on the AUCR(s). 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,

A handwritten signature in black ink that reads "Dave Yost". The signature is written in a cursive style with a large, looping initial "D" and a long, sweeping tail on the "y".

**Dave Yost**  
Auditor of State

September 18, 2012

cc: John Eardley, Director of Fiscal Services, Twin Valley Behavioral Healthcare  
Ed Desmond, CSN Director, Twin Valley Behavioral Healthcare

Appendix A  
Twin Valley 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
<b>Twin Valley CSN AUCR</b>				
<b>Schedule A-1, Uniform Cost Report</b>				
<b>Pharmacological Mgt. (Medication/Somatic.)</b>				
Column 10-Un-Allowable Costs	\$ -	\$ 4,857	\$ 4,857	To reclassify Cost Savings Days to Un-Allowable Costs
<b>BH Counseling and Therapy (Ind.) (Ind. Counseling)</b>				
Column 10-Un-Allowable Costs	\$ -	\$ 1,079	\$ 1,079	To reclassify Cost Savings Days to Un-Allowable Costs
<b>BH Counseling and Therapy (Gp.) (Gp. Counseling)</b>				
Column 10-Un-Allowable Costs	\$ -	\$ 540	\$ 540	To reclassify Cost Savings Days to Un-Allowable Costs
<b>Community Psychiatric Supportive Treatment (Ind.) (Ind. CSP)</b>				
Column 10-Un-Allowable Costs	\$ -	\$ 26,441	\$ 26,441	To reclassify Cost Savings Days to Un-Allowable Costs
<b>Community Psychiatric Supportive Treatment (Gp.) (Gp. CSP)</b>				
Column 10-Un-Allowable Costs	\$ -	\$ 540	\$ 540	To reclassify Cost Savings Days to Un-Allowable Costs
<b>Home Based (Other MH Serv.)</b>				
Column 10-Un-Allowable Costs	\$ -	\$ 10,253	\$ 10,253	To reclassify Cost Savings Days to Un-Allowable Costs
<b>Forensic Monitor (Other MH Serv.)</b>				
Column 10-Un-Allowable Costs	\$ -	\$ 2,698	\$ 2,698	To reclassify Cost Savings Days to Un-Allowable Costs
<b>Jail Support Medication Somatic (Other MH Serv.)</b>				
Column 10-Un-Allowable Costs	\$ -	\$ 3,777	\$ 3,777	To reclassify Cost Savings Days to Un-Allowable Costs
<b>ACT Team (Peer Support, Outreach, etc.)</b>				
Column 10-Un-Allowable Costs	\$ -	\$ 2,158	\$ 2,158	To reclassify Cost Savings Days to Un-Allowable Costs
		\$ 52,343	\$ 52,343	

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**TWIN VALLEY BEHAVIORAL HEALTHCARE: TWIN VALLEY COMMUNITY SUPPORT NETWORK**

**FRANKLIN 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  
OCTOBER 2, 2012**