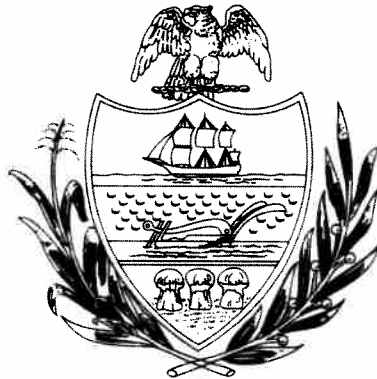


OFFICE OF THE COUNTY CONTROLLER

**THREE RIVERS YOUTH
REPORT ON CONTRACT
COMPLIANCE PROCEDURES
FOR THE PERIOD JULY 1, 2007
THROUGH JUNE 30, 2009**



December 4, 2009

MARK PATRICK FLAHERTY
CONTROLLER
COUNTY OF ALLEGHENY

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MARK PATRICK FLAHERTY
CONTROLLER

COUNTY OF ALLEGHENY

OFFICE OF THE CONTROLLER

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GUY A. TUMOLO
DEPUTY CONTROLLER

November 23, 2009

Mr. Marc Cherna
Director
Allegheny County Department of
Human Services
One Smithfield Street, 4th Floor
Pittsburgh, PA 15222

**SUBJECT: Compliance Procedures Applied to Contracts #76154 and #90033
Between Three Rivers Youth and Allegheny County Department of
Human Services for the Period July 1, 2007 through June 30, 2009**

Dear Mr. Cherna:

We have applied compliance procedures to contracts #76154 and #90033 between the Allegheny County Department of Human Services (“DHS”) and Three Rivers Youth. We performed these compliance procedures to ensure that Three Rivers Youth was in compliance with the scope and terms of the agreements. Our compliance procedures covered the period from July 1, 2007 through June 30, 2009.

The application of our compliance procedures revealed that Three Rivers Youth billed the County \$15,410 in excess of the allowable amount for emergency shelter services, improperly charged Allegheny County \$25,804 for group home expenditures, overstated its net eligible program expenditures by \$82,692, and did not follow the guidance in the Allegheny County DHS *Provider Audit Guidelines* pertaining to the preparation of its financial reporting package for the year ended June 30, 2008. In addition, Three Rivers Youth’s written policies and procedures do not consistently match the policies and procedures actually being utilized, and there are some significant weaknesses in both the written policies and procedures and those actually being utilized. Three Rivers Youth was unable to locate some of the programmatic case files we requested during our review, and we determined that some of the case files do not contain documentary

Mr. Marc Cherna
November 23, 2009

evidence to support the provision of certain program services during the period to which we applied our procedures.

Three Rivers Youth needs to conduct a more thorough review of invoices to the County prior to issuance, improve its financial reporting process, review and update its written internal control policies and procedures, and ensure that those policies and procedures are implemented to strengthen the operation of its internal controls. Three Rivers Youth also needs to improve its maintenance of programmatic records.


We believe that the implementation of our recommendations will improve Three Rivers Youth's compliance with any future County contracts. The results of the application of our compliance procedures are provided in the attached report.

We would like to thank the management and staff of Three Rivers Youth for their courtesy and cooperation during the performance of our procedures.

Very truly yours,



Lori A. Churilla
Assistant Deputy Controller, Auditing



Mark Patrick Flaherty
Controller

cc: Honorable Richard Fitzgerald, President, County Council
Honorable William Russell Robinson, County Council
Honorable Dan Onorato, Chief Executive
Mr. James M. Flynn, Jr., County Manager
Ms. Amy Griser, Budget Director
Mr. Randolph Brockington, Deputy Director, Dept. of Human Services
Mr. William Pagonis, Deputy Director, Department of Human Services
Mr. Joseph Catanese, Director of Constituent Services
Ms. Jennifer Liptak, Budget Director, County Council
Ms. Peggy Harris, President and CEO, Three Rivers Youth
Ms. Claudette R. Lewis, Chair, Board of Directors, Three Rivers Youth
Mr. Guy A. Tumolo, Deputy Controller
Mr. Robert J. Lentz, Assistant Deputy Controller, Accounting
Ms. Pamela Goldsmith, Communications Director

EXECUTIVE SUMMARY

Purpose of Procedures: We performed compliance procedures to ensure that Three Rivers Youth was in compliance with the scope and terms of contracts #76154 and #90033.

Background: Three Rivers Youth is a nonprofit organization that serves abused, neglected, runaway and homeless youth between the ages of 12 to 21 and their families. The agency operates five residential group homes, two shelter programs, a runaway and homeless outreach center, a curfew and truancy center, a transitional living program, and also provides in-home family counseling.

Allegheny County entered into contracts #76154 and #90033 with Three Rivers Youth for the fiscal years ended June 30, 2008 and 2009, respectively. The contracts were subject to various modifications. Allegheny County paid Three Rivers Youth \$2,130,628 and \$1,989,140 for the services rendered by Three Rivers Youth under contracts #76154 and #90033, respectively.

Under the contracts, Three Rivers Youth was to provide specific services, including the provision of emergency shelter, in-home and group home services. The contracts also permitted funding to be used for concrete goods and services provided to individuals in need (limited to \$500 per family and subject to DHS approval) as well as the administrative costs associated with one of the Organization's emergency shelters, its transitional living program and its outreach center which are primarily funded by the federal government. Contract #90033 also contained an allocation for the provision of mental health services.

Results in Brief: While performing our procedures, we found that Three Rivers Youth needs to improve the documentation and implementation of its policies and procedures to strengthen internal controls, conduct a more thorough review of its invoices to the County prior to issuance, and improve its financial reporting process. Specifically, we found that:

Finding #1

Three Rivers Youth billed Allegheny County DHS \$7,854 and \$7,556 in excess of the allowable amounts for emergency shelter services for a youth from Philadelphia during the fiscal year ended June 30, 2008, and 2009, respectively.

EXECUTIVE SUMMARY

Finding #2

- Three Rivers Youth improperly charged Allegheny County DHS \$25,804 for group home expenditures for a Philadelphia youth for the year ended June 30, 2008.
- Three Rivers Youth also overstated its net eligible program expenditures by at least \$82,692.

Finding #3

Three Rivers Youth submitted a financial reporting package for the year ended June 30, 2008 that did not meet the requirements specified in the Allegheny County DHS *Provider Audit Guidelines*.

Finding #4

The internal control policies and procedures actually being utilized by Three Rivers Youth do not always match the Organization's written policies and procedures, and there are weaknesses in both the written policies and procedures and those actually being utilized.

Finding #5

Many of Three River Youth's case files lack documentary evidence to support the provision of certain program services.

Finding #6

The Organization was unable to produce three case files that we requested during the performance of our procedures.

Recommendations:

We recommend that Three Rivers Youth management:

Recommendation #1

- Immediately pay to Allegheny County DHS \$7,854 and \$7,556 for the cost allocable to the Philadelphia youth based on total care days for the years ended June 30, 2008 and 2009.
- Conduct a more thorough review of invoices to the County prior to issuance.

Recommendation #2

- Immediately pay to the County \$25,804, the minimum amount by which net eligible program expenditures were overstated.
- Resolve the Organization's exclusions totaling \$82,692 from other income in its statement of functional

EXECUTIVE SUMMARY

expenditures with Allegheny County DHS, including payment of any liability that DHS concludes exists.

- Carefully review the financial reporting package in future years to identify any such errors prior to issuance.

Recommendation #3

Review with the Organization's auditors the Allegheny County DHS *Provider Audit Guidelines* before preparing and prior to issuing the financial reporting package to ensure that the applicable financial reporting requirements are met.

Recommendation #4

- Review and update Three Rivers Youth's written policies and procedures to provide for adequate and effective internal controls.
- Ensure that the updated written policies and procedures are implemented.

Recommendation #5

Have case managers review the work statements that identify the services to be provided and enhance their monitoring to ensure that any deficiencies in the provision of service or documentation to evidence the provision of service are quickly identified and remedied.

Recommendation #6

Exercise greater care to ensure that programmatic records are maintained for the contractually-mandated retention period and that the manner of storage facilitates timely retrieval.

I. Introduction

Background

Three Rivers Youth is a nonprofit organization that serves abused, neglected, runaway and homeless youths between the ages of 12 to 21 and their families. The agency operates five residential group homes, two shelter programs, a runaway and homeless outreach center, a curfew and truancy center, a transitional living program, and also provides in-home family counseling.

Allegheny County entered into contracts #76154 and #90033 with Three Rivers Youth for the fiscal years ended June 30, 2008 and 2009, respectively. Allegheny County paid Three Rivers Youth \$2,130,628 and \$1,989,140 for the services rendered by Three Rivers Youth under contracts #76154 and #90033, respectively.

Under the contracts, Three Rivers Youth was to provide specific services, including the provision of group home, emergency shelter, and in-home services. The contracts also permitted funding to be used for concrete goods and services provided to individuals in need (limited to \$500 per family and subject to DHS approval), as well as the administrative costs associated with one of the Organization's emergency shelters, its transitional living program and its outreach center which are primarily funded by the federal government. Contract #90033 also contained an allocation for the provision of mental health services.

Of Three Rivers Youth's five group homes, two serve males and three serve females. Youths between the ages of 12 to 18 who have been victims of abuse and neglect and have experienced failures at home or at school are accepted for group home services. The goals of the group home service are to help each youth overcome the pain of abuse and neglect and grow toward responsible self-sufficiency, to return each youth to their family whenever possible, and to assist each youth in achieving individually-targeted goals and educational and vocational success. The group home services provided include:

- twenty-four hour residential care and supervision
- clinical assessment and individualized treatment
- individual, group, and family therapy
- educational assessment, planning, coordination, and support services
- placement in local public schools or specialized private schools
- tutoring and vocational evaluation and training, as needed
- psychiatric consultation and evaluation

I. Introduction

- therapeutic recreation within the group home and community, including participation in cultural activities

Youths between the ages of 12 to 17 who are runaways or homeless, or are at risk of running away or becoming homeless, are accepted for emergency shelter services. The goals of the emergency shelter services are to get runaway and homeless youths off of the street, to reunite them with their families as soon as possible, to strengthen the relationship between the youths and their families, and to assist youths in receiving ongoing care and support from family substitutes when reunification with their families is not an option. The emergency shelter services provided include:

- crisis counseling via a 24-hour hotline for runaway and homeless youth
- provision of health care, shelter, food, and clothing
- family counseling to reunite teens with families
- aftercare and follow-up for all youths served

The family partnership (in-home) program accepts families who are at risk for one or more of their children being placed outside of the home due to neglect, abuse, or serious parent/child conflict. The goals of the family partnership program are to maintain the safety and welfare of the youths and all family members while preserving and strengthening the family unit, to focus on the family as a whole and meet family and individual needs. The family partnership services provided include:

- crisis intervention and assessment of youth safety and family and youth needs
- safety management
- family and individual counseling
- parent education and home management skills training
- academic support
- respite services
- information and/or referrals regarding family needs and an aftercare plan

II. Scope and Methodology

We applied compliance procedures to contracts #76154 and #90033 between Allegheny County DHS and Three Rivers Youth to ensure that Three Rivers Youth was in compliance with the scope and terms of the contracts. Our compliance procedures covered the period from July 1, 2007 through June 30, 2009.

Specifically, we performed the following procedures:

- Interviewed Three Rivers Youth personnel to gain an understanding of the processes and controls in place to ensure financial accountability for contract services and compliance with its County contracts, laws and regulations, DPW requirements, and any other applicable requirements.
- Interviewed Three Rivers Youth management to gain an understanding of the monitoring activities performed to identify deficiencies in the operation of internal controls, the reporting of contract activities, compliance with its County contracts, laws and regulations, DPW requirements, and any other applicable requirements.
- Reviewed the minutes of Three Rivers Youth Board meetings for the period July 1, 2007 through June 30, 2009.
- Examined records of Three Rivers Youth that were relevant to the administration of the contracts to determine compliance with the contracts.
- Verified that Three Rivers Youth submitted the required reports to DHS for the period from July 1, 2007 through June 30, 2009.
- Examined (on a test basis) the documentation supporting costs claimed for reimbursement under the contracts to verify that the costs were allowable costs incurred to satisfy the objectives described in the scope of services.
- Tested on a limited basis Three Rivers Youth's compliance with applicable laws and regulations and the provisions of contracts #76154 and #90033.

We performed these procedures during September 2009. We provided a draft copy of this report to the President and CEO of Three Rivers Youth for comment (see page 17).

III. Findings and Recommendations

Finding #1

**Contract Billings in
Excess of Allowable Amounts**

Three Rivers Youth's Dithridge emergency shelter program was funded by Allegheny County DHS on a program-funded basis from July 1, 2007 through December 31, 2008 (and on a fee-for-service basis thereafter). Three Rivers Youth provided 54 days of care to a Philadelphia youth at the Organization's Dithridge emergency shelter during the months of June (27 days) and July (27 days) 2008. Pennsylvania Department of Public Welfare regulations required the youth to be transferred from the residential group home in which she was previously housed to another facility for safety reasons, and the Organization's other two female group homes were fully occupied at that time. Therefore, the Philadelphia youth was transferred to the Organization's emergency shelter where she remained for two months.

While the Organization's transfer of the youth to the Dithridge shelter may have been appropriate under the circumstances, the costs associated with housing and caring for the Philadelphia youth were not identified and excluded from the amount billed to Allegheny County DHS for the provision of the emergency shelter services for the year ended June 30, 2008.

The City of Philadelphia was invoiced for the provision of group home services to the youth for the period in which the youth was housed at the Dithridge shelter, but that service fee income was not used to reduce Allegheny County's program costs for the year ended June 30, 2008.

This condition occurred because management did not consider that the costs associated with housing and serving the Philadelphia youth should be determined and segregated from the amount billed to Allegheny County. The effect of this condition is that Three Rivers Youth billed Allegheny County \$7,854 and approximately \$7,556 in excess of the allowable amount for emergency shelter services for the years ended June 30, 2008 and 2009, respectively. Three Rivers Youth's audit report for the year ended June 30, 2009 had not yet been issued at the time we performed our procedures. Therefore, the 2009 costs associated with the Philadelphia youth are based on 2008 total program costs.

III. Findings and Recommendations

Recommendations

We recommend that Three Rivers Youth:

- Immediately pay to Allegheny County DHS \$7,854, the cost allocable to the Philadelphia youth based on total care days for the year ended June 30, 2008.
- Immediately pay to Allegheny County DHS \$7,556, the cost allocable to the Philadelphia youth based on total care days for the year ended June 30, 2009.
- Carefully review invoices to Allegheny County for costs that are not allocable to the County prior to their submission.

III. Findings and Recommendations

Finding #2

Overstatement of Net Eligible Program Expenditures

Three Rivers Youth improperly reported non-County (Philadelphia) expenditures and partially-offsetting non-County reimbursements in its “Statement of Functional Expenditures, Revenues, Contract Amounts Relating to Grants from Allegheny County Department of Human Services Programs for the year ended June 30, 2008”. The group home service revenues received from Philadelphia were \$25,804 less than the group home expenditures allocable to Philadelphia, and the Philadelphia group home expenditures that were not funded by Philadelphia were improperly charged to Allegheny County, which resulted in an overstatement of Three Rivers Youth’s net eligible program expenditures in the amount of \$25,804.

Three Rivers Youth also improperly excluded at least \$82,692 of other revenue from the statement. We were unable to determine whether additional amounts were improperly excluded because Three Rivers Youth was unable to fully substantiate the amounts excluded from other revenue at the time we performed our procedures. Since other unrestricted receipts must be used to reduce Allegheny County’s program costs, the exclusion of unrestricted receipts from the statement results in an overstatement of Three Rivers Youth’s net eligible program expenditures, which in this case amounted to at least \$82,692.

Net eligible program expenditures were overstated because Three Rivers Youth did not carefully review the supplemental schedules prior to issuance of the reporting package for the year ended June 30, 2008, and consequently, did not identify the errors. The effect of this condition is that Three Rivers Youth owes Allegheny County DHS at least \$25,804 due to expenses related to a Philadelphia youth. Three Rivers Youth may also be required to repay additional funds after DHS reviews the facts and circumstances related to the amounts excluded from other income amounting to \$82,692. Three Rivers Youth’s audit report for the year ended June 30, 2009 had not yet been issued at the time we performed our procedures, and we were therefore unable to apply procedures to determine whether there were similar reporting deficiencies applicable to that year.

III. Findings and Recommendations

Recommendations

We recommend that Three Rivers Youth:

- Immediately pay to Allegheny County DHS \$25,804, the amount by which net eligible program expenditures were overstated due to the inclusion of non-County revenues and expenditures in the statement of functional expenditures for the year ended June 30, 2008.
- Provide Allegheny County DHS with the facts and circumstances related to the amounts totaling \$82,692 that the Organization excluded from other revenue in its statement of functional expenditures for the year ended June 30, 2008 so that DHS can make a determination regarding amounts, if any, that are required to be repaid.
- Carefully review the supplemental schedules each year to identify any errors before the Organization's reporting package is issued.

III. Findings and Recommendations

Finding #3

Departure from Financial Reporting Guidelines

The Allegheny County Department of Human Services *Provider Audit Guidelines* identifies and provides examples of the supplemental schedules that must accompany a service provider's reporting package when the service provider receives more than \$500,000 of contract funding from DHS in a single (County) fiscal year. Three Rivers Youth's reporting package for the fiscal year ended June 30, 2008 contained supplemental schedules, but did not include all of the required supplemental schedules. In addition, the supplemental schedules included were generally not presented in the appropriate formats.

This condition occurred because Three Rivers Youth and its auditors did not review the *Provider Audit Guidelines* before preparing the required supplemental schedules or prior to finalizing the reporting package to ensure that the manner of reporting utilized would meet the established financial reporting requirements. The effect of this condition is that Three Rivers Youth did not comply with the financial reporting requirements for the year ended June 30, 2008.

Recommendation

We recommend that Three Rivers Youth review (with its auditors) the financial reporting requirements contained in the *Provider Audit Guidelines* before preparing the supplemental schedules and prior to finalizing the reporting package each year to ensure that the Organization's financial reporting complies with the established requirements.

III. Findings and Recommendations

Finding #4

Weak Design and Implementation of Internal Control Policies and Procedures

Three Rivers Youth's written policies and procedures that govern financial accounting and reporting have not been updated for several years. As a result, the policies and procedures actually utilized by the Organization often differ significantly from its written policies and procedures. In addition, many of the written policies and procedures do not indicate the individuals responsible for performing various functions. Consequently, the policies and procedures as written do not provide for adequate segregation of duties. Finally, the policies and procedures actually being utilized by Three Rivers Youth, while better in some cases than its written policies and procedures, also lack the ability to accomplish certain internal control objectives. Of particular concern is the weakness in the design and implementation of policies and procedures pertaining to the handling and recording of cash. It appears that this condition is attributable to management's perception that Three Rivers Youth's policies and procedures were adequate.

When an Organization does not establish and implement written policies and procedures designed to address the Organization's internal control objectives, there is a greater risk that any errors or fraud that may occur will not be detected by the Organization in a reasonable period of time.

Recommendations

We recommend that Three Rivers Youth update its written policies and procedures to address its internal control objectives, and then take steps to ensure that the updated policies and procedures are properly implemented.

III. Findings and Recommendations

Finding #5

Lack of Adequate Documentation to Support Provision of Program Services

The work statements in Exhibit A to contracts #76154 and #90033 identify the services to be provided by Three Rivers Youth under the contracts. We examined Three Rivers Youth's case files on a test basis and determined that some of the files did not contain documentary evidence to support the provision of certain required program services. Specifically, we found that:

- 2 of 10 group home youth case files did not contain an individualized service plan
- 4 of 10 group home youth case files and 6 of 17 emergency shelter youth case files did not contain documentation to support the provision of at least one hour per week of group therapy for the duration of the youth's stay
- 4 of 10 group home youth case files and 6 of 17 emergency shelter youth case files did not contain documentation to support the provision of at least one hour per week of individual therapy for the duration of the youth's stay
- 2 of 10 group home case files did not contain monthly reports to document the Organization's monitoring of the youth's educational progress
- 3 of 10 group home youth case files did not contain the results of a life skills assessment
- 8 of 17 emergency shelter youth case files did not contain an emergency placement plan. This plan must be established within 5 days of acceptance and must be updated weekly.

This condition is attributable to inadequate supervisory review to ensure that all required documentation is prepared and maintained in case files. The effect of this condition is that Three Rivers Youth is unable to substantiate on a consistent basis that services were provided as prescribed by the work statement.

Recommendations

We recommend that Three Rivers Youth require its case managers to review the work statements that identify the services to be provided and enhance its monitoring to ensure that any deficiencies in the provision of service or documentation to evidence the provision of service are quickly identified and remedied.

III. Findings and Recommendations

Finding #6

Inability to Produce Programmatic Files Requested During the Contractually-Mandated Retention Period

Section 14.C. paragraph 1 of contracts #76154 and #90033 require programmatic records to be retained by Three Rivers Youth for a period of four years from the final contract payment dates. Three Rivers Youth was unable to produce three of 20 programmatic case files for youths whom it asserts received emergency shelter services during the period to which we applied our compliance procedures. Three Rivers Youth's management has indicated that its inability to produce the requested files is attributable to the recent relocation of its primary office space.

Three Rivers Youth's inability to produce the requested case files limits its ability to support its assertion that the three youths received the emergency shelter services for which Allegheny County was billed.

Recommendations

We recommend that Three Rivers Youth exercise greater care in the future to ensure that programmatic records are maintained for the duration of the contractually-mandated retention period and that the manner of storage facilitates timely retrieval.



Peggy B. Harris, M.P.A.
President & CEO

6117 Broad Street, Pittsburgh, Pennsylvania 15206
Phone: 412.441.5020 Fax: 412.441.5021

www.threeriversyouth.org

November 16, 2009

Mr. Mark Patrick Flaherty
Allegheny County Courthouse
Controller's Office
104 Courthouse
436 Grant Street
Pittsburgh, Pa. 15219-2498

Dear Mr. Flaherty,

In the attached document, please find Three Rivers Youth's response to the findings and recommendations cited in your draft copy of the report entitled *Three Rivers Youth Report on Contract Compliance Procedures for the period July 1, 2007 through June 30, 2009*.

Three Rivers Youth is a nationally accredited organization and accordingly is committed to the highest standards of ethics, program and business operations and excellence in performance outcomes. We have received your report as part of our commitment to continuous quality improvement which enables us to consider many and diverse perspectives from external sources.

After reviewing our responses, please do not hesitate to contact me should you require additional information.

Sincerely

Peggy B. Harris, MPA
President & CEO

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Finding #1: Contract Billings in Excess of Allowable Amounts

Three Rivers Youth acknowledges that a non-Allegheny County youth resided in our shelter program for a period of 54 days during the contract period under review. Three Rivers Youth respectfully requests that Allegheny County forgive the repayment of any costs it believes were associated with providing shelter to this non-Allegheny county youth on the basis of the following:

- Three Rivers Youth did not engage in deceptive practices to misrepresent allowable costs incurred by Allegheny County. As was disclosed, census data clearly identified this youth as a non-county resident.
- Three Rivers Youth has never had to make such a decision to utilize its shelter for a non-county resident and as such, we see this as an anomaly and not part of our business practices.
- Three Rivers Youth was acting on the basis of a court order issued to provide for the safety and wellness of a Pennsylvania resident- albeit not an Allegheny County resident by origin. Three Rivers Youth believes that Allegheny County shares and respects the importance of safety as a paramount priority of any provider.
- Even if the County argues the youth consumed services which were paid by the county, we would counter that the basis of the county's calculation is based on a faulty premise of a percentage of an entire of year of costs.



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Finding #2: Overstatement of Net Eligible Program Expenditures

In regards to the finding that group home service revenues received from Philadelphia were \$25,804 less than the group home expenditures allocable to Philadelphia, the calculation by the DHS auditors failed to include \$28,967.60 of other revenue applicable to Philadelphia other than the service revenue fees. Specifically, Clothing Reimbursement of \$635.65 and National School Lunch Program Reimbursement of \$28,331.95

Part 2 of Finding #2: Re the exclusion of \$82,692 of other revenue from Allegheny County schedules.

After reviewing the records the actual amount of revenue excluded from the Allegheny County schedules was \$96,339 of Net Special Event Revenue, however, so too was \$97,989 in pension expense, reported in accordance with generally accepted accounting principals (GAAP) on the audited statement of activities, excluded from Allegheny County schedules. Inclusion of the pension expense, allocated based on direct costs and units of service provided, would offset the aforementioned other revenue. Therefore, net eligible program expenditures were not overstated in the supplemental schedules.

Please refer to attached schedule.



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Finding #3: Departure From Financial Reporting Guidelines

As recommended, Three Rivers Youth will review with our auditors the financial reporting requirements contained in the *Provider Audit Guidelines* before preparing the supplemental schedules and prior to finalizing the reporting package each year to ensure that the Organization's financial reporting complies with the established requirements.

Finding #4: Weak Design and Implementation of Internal Control Policies and Procedures

Three Rivers Youth acknowledges that it has not recently completed a comprehensive revision of its financial policies and procedures. With your recommendation and understanding the need for policies to reflect actual practice and more importantly, best practices, we will undertake a review that will result in enhanced operations. This will include a specific focus on cash management, segregation of duties and improved internal controls. The President and CEO will also enhance her oversight role. In order to ensure that the revised policies and procedures continue to reflect practices, we will include a periodic review as part of our CQI (Continuous Quality Improvement) program.



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Finding #5: Lack of Adequate Documentation to Support Provision of Program Services

Three Rivers Youth will strengthen its review of its case file documentation. While Three Rivers Youth does have a program of periodic record review (CQI process referenced above), it is apparent that enhanced focus will ensure greater integrity of not only documentation but of services provided.

Finding #6: Inability to Produce Programmatic Files Requested During the Contractually-Mandated Retention Period

Three Rivers Youth acknowledges that it was unable to retrieve a few files requested during this review period. In part this is due to an unwieldy, decentralized filing system. This deficiency will be addressed through a new agency-wide electronic file/case management that will be launched within the next 30 days. We expect to see among other things, increased accessibility and improved security of data .



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