OF SACRAMENTO COUNTY

DEPARTMENT OF FINANCE - AUDITOR-CONTROLLER DIVISION – INTERNAL AUDIT UNIT

INTERNAL AUDIT REPORT

TLCS, INC., HOPE COOPERATIVE AGREED-UPON PROCEDURES

DEPARTMENT OF HEALTH SERVICES



Audit Committee Submittal Date: 10/14/2021

SUMMARY

Background

We have performed an agreed upon procedures engagement of TLCS, Inc., Hope Cooperative fiscal compliance with Mental Health Services and Behavioral Health Services for the July 1, 2018 through June 30, 2020 contract years.

Audit Objective

This agreed-upon procedures engagement was conducted to assist the Department of Health Services to assess TLCS's financial condition and compliance with the County contracts.

Summary

Our engagement reported that TLCS, Inc., lacked policies and procedures regarding processes for making electronic payments and detailed procedures for proper file storage and destruction of old records.



County of Sacramento

September 7, 2021

Chevon Kothari, Director Department of Health Services County of Sacramento 7001-A East Parkway, Suite 1100 Sacramento, California 95823

INDEPENDENT ACCOUNTANT'S REPORT ON APPLYING AGREED-UPON PROCEDURES

Dear Ms. Kothari:

We have performed the procedures, enumerated below, which were requested and agreed to by your department regarding TLCS, Inc., Hope Cooperative (TLCS)'s fiscal compliance as outlined in the contractual agreements (Agreements) listed below:

- Mental Health Services Transitional Community Opportunities for Recovery and Engagement (TCORE) and assignment of contract from Human Resource Consultants, Inc.
 - Contract No. 7202100-19-002 for the period July 1, 2018 to June 30, 2019
- Mental Health Services Transitional Community Opportunities for Recovery and Engagement (TCORE) and
 - Contract No. 7202100-20-002 for the period July 1, 2019 to June 30, 2020
- Mental Health Services Regional Support Team
 Contract No. 7202900-19-014 for the period July 1, 2018 to June 30, 2019
- > Mental Health Services Regional Support Team
 - Contract No. 7202900-20-014 for the period July 1, 2019 to June 30, 2020
- > Mental Health Services New Directions Residential Services
 - Contract No. 7202900-19-029 for the period July 1, 2018 to June 30, 2019
- > Mental Health Services New Directions Residential Services
 - Contract No. 7202900-20-029 for the period July 1, 2019 to June 30, 2020

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- > Mental Health Services Respite Services
 - Contract No. 7202900-19-080 for the period July 1, 2018 to June 30, 2019
- Mental Health Services Respite Services
 Contract No. 7202900-20-080 for the period July 1, 2019 to June 30, 2020
- Mental Health Services Triage Navigator and Mobile Crisis Unit
 - $_{\odot}$ Contract No. 7202900-19-106 for the period July 1, 2018 to June 30, 2019
- Mental Health Services Triage Navigator and Mobile Crisis Unit
 - \circ Contract No. 7202900-20-106 for the period July 1, 2019 to June 30, 2020
- Behavioral Health Services Outpatient Treatment Services for Alcohol and Other Substance Abuse Disorders
 - Contract No. 7206000-20-112 for the period July 1, 2019 to June 30, 2020

This agreed-upon procedures engagement was conducted to assist the Department of Health Services (DHS) to assess TLCS's financial condition and compliance with the above Agreements.

DHS's management is responsible for monitoring TLCS's compliance with the Agreements' requirements. The sufficiency of the procedures is solely the responsibility of DHS's management. Consequently, we make no representation regarding the sufficiency of the procedures described below and on page 3 of this report either for the purpose for which this report has been requested or for any other purpose. This report is applicable solely to the Agreements referred above and does not pertain to any other agreements of DHS or TLCS.

The procedures performed and our findings were as follows:

 Internal Controls - We reviewed TLCS's written internal control policies and procedures including purchasing, vendor payments, payroll, claim submissions, cost allocations, general ledger, and financial report preparation. We also reviewed TLCS's written procedures for clients' admission and release, program eligibility verification, and services provided for its programs listed in the Agreements.

Finding: We noted TLCS did not update its record retention and electronic disbursement procedures. See Attachment I, *Current Findings and Recommendations*.

Chevon Kothari, Director September 7, 2021 Page 3

2. Financial Statements - We inspected TLCS's audit reports for fiscal years ended June 30, 2019 and 2020 to identify any concerns or issues that require your attention.

Finding: We did not note any exceptions as a result of this procedure.

3. Claim Submissions - We inspected TLCS's monthly invoice claims for August 2018, March 2019, June 2019, August 2019, March 2020, and June 2020. For actual cost reimbursement claims, we traced amounts claimed to documentation supporting the expense. For provisional rate and negotiated rate claims, we traced the claimed units of service to client service unit reports generated from Avatar.

Finding: We did not note any exceptions as a result of this procedure.

4. General Ledger - We traced TLCS's monthly invoice claims for August 2018, March 2019, June 2019, August 2019, March 2020, and June 2020 to TLCS's general ledger.

Finding: We did not note any exceptions as a result of this procedure.

5. Cost Allocations - We reviewed TLCS's cost allocation policies and procedures to identify any concerns or issues that required your attention. We tested the transactions listed at Item #3 above to identify any issues related to cost allocations.

Finding: We did not note any exceptions as a result of this procedure.

6. Funding Sources - We inspected TLCS's general ledger and invoice claims for July 2018, March 2019, June 2019, November 2019, March 2020, and June 2020 to identify any inappropriate or duplicated charges.

Finding: We did not note any exceptions as a result of this procedure.

This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not perform an audit or examination, or review, the objectives of which would be the expression of an opinion or conclusion, respectively, on TLCS's financial statements or schedules, internal controls, or compliance with the Agreements. Accordingly, we do not express such an opinion or conclusion. 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 Sacramento County Board of Supervisors, those charged with governance, Sacramento County Audit Committee, Sacramento County

Chevon Kothari, Director September 7, 2021 Page 4

Executive, and DHS's management. It is not intended to be, and should not be, used by anyone other than those specified parties. However, this report is a matter of public record and its distribution is not limited.

Sincerely,

BEN LAMERA DIRECTOR OF FINANCE

Ross McCarthy, CPA By: Senior Audit Manager

Enclosures

Attachment I: Current Findings and Recommendations Schedule I: TCORE Claims Paid Fiscal Year 2018-19 Schedule II: Regional Support Team Claims Paid Fiscal Year 2018-19 Schedule III: New Directions Claims Paid Fiscal Year 2018-19 Schedule IV: Crisis Respite Claim Paid Fiscal Year 2018-19 Schedule V: Triage Navigator Claims Paid Fiscal Year 2018-19 Schedule VI: TCORE Claims Paid Fiscal Year 2019-20 Schedule VII: Regional Support Team Claims Paid Fiscal Year 2019-20 Schedule VIII: New Directions Claims Paid Fiscal Year 2019-20 Schedule IX: Crisis Respite Claim Paid Fiscal Year 2019-20 Schedule IX: Crisis Respite Claim Paid Fiscal Year 2019-20 Schedule X: Triage Navigator Claims Paid Fiscal Year 2019-20 Schedule X: Triage Navigator Claims Paid Fiscal Year 2019-20 Schedule X: Triage Navigator Claims Paid Fiscal Year 2019-20 County of Sacramento Department of Health Services Fiscal Monitoring – TLCS, Inc. Agreed-Upon Procedures Current Findings and Recommendations For the Period July 1, 2018 to June 30, 2020

1. Closed File Storage Policy and Procedures

Condition

TLCS, Inc. (TLCS)'s *Closed File Storage Policy and Procedures* did not include specified time periods for the retention of records. The policy should state the time period for the different categories and types of records to be maintained and then destroyed. TLCS's current policy designates certain managers to be responsible for overseeing records and destruction in accordance with the policies dictated by the County of Sacramento and under the internal direction of the Director for Program Services at TLCS.

Different governmental and grantees of awards have different record retention and destruction requirements. Documenting record retention and destruction timetables will help prevent destroying records too soon or incurring unnecessary storage costs.

County contract Section XXXIII *Audits and Records*, states in pertinent part, "COUNTY or its designee shall have the right at reasonable times and intervals to audit, at CONTRACTOR's premises, CONTRACTOR's financial and program records as COUNTY deems necessary to determine CONTRACTOR's compliance with legal and contractual requirements and the correctness of claims submitted by CONTRACTOR. CONTRACTOR shall maintain such records for a period of four years following termination of the Agreement..."

It appears TLCS management did not record retention and destruction timetables as part of its record retention policies and procedures.

Recommendation

TLCS should develop record retention procedures that ensure documentation for all types of claims are maintained for the required duration of time.

Management Response

DHS concurs with the finding. DHS will require TLCS to develop record retention procedures that ensure documentation for all types of claims are maintained for the required duration of time. TLCS will complete this by September 30, 2021.

County of Sacramento Department of Health Services Fiscal Monitoring – TLCS, Inc. Agreed-Upon Procedures Current Findings and Recommendations For the period March 1, 2018 to June 30, 2020

2. No Documented Process for Electronic Payments

<u>Condition</u>

TLCS, Inc. (TLCS)'s *Cash Disbursement Policies for making payments online* does not clearly state how the functions of receiving the invoice, inputting payment data online, and executing the payment transaction online are separated between different staff members. The controls should ensure no one person is authorized to fully execute electronic disbursements.

Good internal controls dictate written procedures include adequate segregation of duties and control responsibilities must be established and maintained in all functional areas of entity. In general, custodial, processing/operating, and accounting responsibilities should be separated to promote independent review and evaluation of entity operations.

Without written procedures that demonstrate adequate segregation of duties, errors may not be caught timely and assets may not be properly safeguarded.

TLCS management did not provide sufficient detail in describing the duties and responsibilities of making electronic payments.

Recommendation

TLCS should update its policy and procedures to include the specific procedures and responsibilities of the different staff involved with executing electronic payments.

Management Response

DHS concurs with the finding and will require TLCS to update its policy and procedures to include the specific procedures and responsibilities of the different staff involved with executing electronic payments. TLCS will complete this by September 30, 2021.

Schedule I

COUNTY OF SACRAMENTO DEPARTMENT OF HEALTH SERVICES TLCS, INC. FISCAL MONITORING AGREED-UPON PROCEDURES SCHEDULE OF CLAIMS PAID FOR THE PERIOD JULY 1, 2018 TO JUNE 30, 2019

TCORE

Month	Amount Claimed	Amount Paid	Difference
Jul 2018	\$ 373,037	373,037	0
Aug 2018	295,634	295,634	0
Sep 2018	288,756	288,756	0
Oct 2018	320,443	320,443	0
Nov 2018	301,472	301,472	0
Dec 2018	292,966	292,966	0
Jan 2019	429,506	429,506	0
Feb 2019	320,263	320,263	0
Mar 2019	390,825	390,825	0
Apr 2019	372,619	372,619	0
May 2019	357,853	357,853	0
Jun 2019	357,148	357,148	0
Totals	\$ 4,100,521	4,100,521	0

COUNTY OF SACRAMENTO DEPARTMENT OF HEALTH SERVICES TLCS, INC. FISCAL MONITORING AGREED-UPON PROCEDURES SCHEDULE OF CLAIMS PAID FOR THE PERIOD JULY 1, 2018 TO JUNE 30, 2019

REGIONAL SUPPORT TEAM

Month	Amount Amount th Claimed Paid		Difference
Jul 2018	\$ 251,078	251,078	0
Aug 2018	265,675	265,675	0
Sep 2018	251,053	251,053	0
Oct 2018	295,597	295,597	0
Nov 2018	297,064	297,064	0
Dec 2018	663,582	663,582	0
Jan 2019	324,074	324,074	0
Feb 2019	297,949	297,949	0
Mar 2019	866,824	866,824	0
Apr 2019	29,759	29,759	0
May 2019	389,730	389,730	0
Jun 2019	419,631	419,631	0
Totals	\$ 4,352,017	4,352,017	0

Schedule III

COUNTY OF SACRAMENTO DEPARTMENT OF HEALTH SERVICES TLCS, INC. FISCAL MONITORING AGREED-UPON PROCEDURES SCHEDULE OF CLAIMS PAID FOR THE PERIOD JULY 1, 2018 TO JUNE 30, 2019

NEW DIRECTIONS

Month	Amount Claimed	Amount Paid	Difference
Jul 2018	\$ 342,343	342,343	0
Aug 2018	377,636	377,636	0
Sep 2018	313,751	313,751	0
Oct 2018	370,341	370,341	0
Nov 2018	344,312	344,312	0
Dec 2018	611,024	611,024	0
Jan 2019	413,327	413,327	0
Feb 2019	314,277	314,277	0
Mar 2019	560,104	560,104	0
Apr 2019	403,577	403,577	0
May 2019	319,159	319,159	0
Jun 2019	437,659	437,659	0
Totals	\$ 4,807,509	4,807,509	0

Schedule IV

COUNTY OF SACRAMENTO DEPARTMENT OF HEALTH SERVICES TLCS, INC. FISCAL MONITORING AGREED-UPON PROCEDURES SCHEDULE OF CLAIMS PAID FOR THE PERIOD JULY 1, 2018 TO JUNE 30, 2019

MENTAL HEALTH CRISIS RESPITE

Month	Amount Claimed				Difference
Jul 2018	\$	79,919		79,919	0
Aug 2018		82,220		82,220	0
Sep 2018		85,142		85,142	0
Oct 2018		81,941		81,941	0
Nov 2018		73,930		73,930	0
Dec 2018		94,362		94,362	0
Jan 2019		80,311		80,311	0
Feb 2019		85,018		85,018	0
Mar 2019		72,892		72,892	0
Apr 2019		89,795		89,795	0
May 2019		88,424		88,424	0
Jun 2019		89,271		89,271	0
Totals	\$ 1	,003,225	1	1,003,225	0

Schedule V

COUNTY OF SACRAMENTO DEPARTMENT OF HEALTH SERVICES TLCS, INC. FISCAL MONITORING AGREED-UPON PROCEDURES SCHEDULE OF CLAIMS PAID FOR THE PERIOD JULY 1, 2018 TO JUNE 30, 2019

TRIAGE NAVIGATORS

Month	Amount Amount Claimed Paid		Difference	
			Bindronee	
Jul 2018	\$ 125,208	125,208	0	
Aug 2018	132,664	132,664	0	
Sep 2018	133,577	133,577	0	
Oct 2018	128,200	128,200	0	
Nov 2018	126,922	126,922	0	
Dec 2018	129,174	129,174	0	
Jan 2019	123,841	123,841	0	
Feb 2019	141,896	141,896	0	
Mar 2019	119,102	119,102	0	
Apr 2019	142,442	142,442	0	
May 2019	138,300	138,300	0	
Jun 2019	169,543	169,543	0	
Totals	\$ 1,610,869	1,610,869	0	

COUNTY OF SACRAMENTO DEPARTMENT OF HEALTH SERVICES TLCS, INC. FISCAL MONITORING AGREED-UPON PROCEDURES SCHEDULE OF CLAIMS PAID FOR THE PERIOD JULY 1, 2019 TO JUNE 30, 2020

TCORE

Month	Amount Claimed	Amount Paid	Difference
Jul 2019	\$ 360,467	360,467	0
Aug 2019	363,553	363,553	0
Sep 2019	328,191	328,191	0
Oct 2019	413,723	413,723	0
Nov 2019	323,966	323,966	0
Dec 2019	376,356	376,356	0
Jan 2020	415,427	415,427	0
Feb 2020	375,410	375,410	0
Mar 2020	403,688	403,688	0
Apr 2020	386,161	386,161	0
May 2020	391,523	391,523	0
Jun 2020	361,494	361,494	0
Totals	\$ 4,499,959	4,499,959	0

COUNTY OF SACRAMENTO DEPARTMENT OF HEALTH SERVICES TLCS, INC. FISCAL MONITORING AGREED-UPON PROCEDURES SCHEDULE OF CLAIMS PAID FOR THE PERIOD JULY 1, 2019 TO JUNE 30, 2020

REGIONAL SUPPORT TEAM

Month	Amount Claimed	Amount Paid	Difference
Jul 2019	\$ 270,097	270,097	0
Aug 2019	330,943	330,943	0
Sep 2019	300,922	300,922	0
Oct 2019	363,696	363,696	0
Nov 2019	279,449	279,449	0
Dec 2019	305,091	305,091	0
Jan 2020	321,558	321,558	0
Feb 2020	282,972	282,972	0
Mar 2020	328,971	328,971	0
Apr 2020	336,576	336,576	0
May 2020	336,774	336,774	0
Jun 2020	377,233	377,233	0
Totals	\$ 3,834,282	3,834,282	0

Schedule VIII

COUNTY OF SACRAMENTO DEPARTMENT OF HEALTH SERVICES TLCS, INC. FISCAL MONITORING AGREED-UPON PROCEDURES SCHEDULE OF CLAIMS PAID FOR THE PERIOD JULY 1, 2019 TO JUNE 30, 2020

NEW DIRECTIONS

	Amount	Amount		
Month	Claimed	Paid	Difference	
Jul 2019	\$ 312,965	312,965	0	
Aug 2019	323,714	323,714	0	
Sep 2019	286,992	286,992	0	
Oct 2019	372,982	372,982	0	
Nov 2019	312,423	312,423	0	
Dec 2019	335,570	335,570	0	
Jan 2020	345,224	345,224	0	
Feb 2020	321,800	321,800	0	
Mar 2020	354,656	354,656	0	
Apr 2020	375,084	375,084	0	
May 2020	440,531	440,531	0	
Jun 2020	509,953	509,953	0	
Totals	\$ 4,291,894	4,291,894	0	

Schedule IX

COUNTY OF SACRAMENTO DEPARTMENT OF HEALTH SERVICES TLCS, INC. FISCAL MONITORING AGREED-UPON PROCEDURES SCHEDULE OF CLAIMS PAID FOR THE PERIOD JULY 1, 2019 TO JUNE 30, 2020

MENTAL HEALTH CRISIS RESPITE

Month	Amount Claimed					Difference
Jul 2019	\$	79,810	79,810		0	
Aug 2019		74,825	74,825		0	
Sep 2019		72,838	72,838		0	
Oct 2019		77,826	77,826		0	
Nov 2019		79,850	79,850		0	
Dec 2019		75,261	75,261		0	
Jan 2020		77,639	77,639		0	
Feb 2020		65,669	65,669		0	
Mar 2020		80,196	80,196		0	
Apr 2020		85,000	85,000		0	
May 2020		85,000	85,000		0	
Jun 2020		85,000	85,000		0	
Totals	\$	938,914	938,914	1	0	

Schedule X

COUNTY OF SACRAMENTO DEPARTMENT OF HEALTH SERVICES TLCS, INC. FISCAL MONITORING AGREED-UPON PROCEDURES SCHEDULE OF CLAIMS PAID FOR THE PERIOD JULY 1, 2019 TO JUNE 30, 2020

TRIAGE NAVIGATORS

Month	Amount Claimed	Amount Paid	Difference
Jul 2019	\$ 149,890	149,890	0
Aug 2019	136,971	136,971	0
Sep 2019	135,399	135,399	0
Oct 2019	148,510	148,510	0
Nov 2019	142,312	142,312	0
Dec 2019	139,933	139,933	0
Jan 2020	167,793	167,793	0
Feb 2020	134,399	134,399	0
Mar 2020	147,834	147,834	0
Apr 2020	178,042	178,042	0
May 2020	150,807	150,807	0
Jun 2020	129,478	129,478	0
Totals	\$ 1,761,368	1,761,368	0

Schedule XI

COUNTY OF SACRAMENTO DEPARTMENT OF HEALTH SERVICES TLCS, INC. FISCAL MONITORING AGREED-UPON PROCEDURES SCHEDULE OF CLAIMS PAID FOR THE PERIOD JULY 1, 2019 TO JUNE 30, 2020

OUTPATIENT TREATMENT SERVICES

Month	Amount Claimed				Difference
Jul 2019	\$	-	-	0	
Aug 2019		-	-	0	
Sep 2019		3,142	3,142	0	
Oct 2019		10,788	10,788	0	
Nov 2019		3,793	3,793	0	
Dec 2019		2,960	2,960	0	
Jan 2020		5,443	5,443	0	
Feb 2020		7,150	7,150	0	
Mar 2020		5,602	5,602	0	
Apr 2020		11,313	11,313	0	
May 2020		9,701	9,701	0	
Jun 2020		6,406	6,406	0	
Totals	\$	66,298	66,298	0	