



October 31, 2013

Mr. Dwindal T. Toliver
Chief Executive Officer
ComForcare Senior Services
2330 Vartan Way, Suite 140
Harrisburg, Pennsylvania 17110

Dear Mr. Toliver:

Enclosed for your review is the final audit report of Comforcare Senior Services which was recently completed by this office.

Your agency's response has been incorporated into the final report and is labeled Appendix B.

The final report will be forwarded to the Department's Office of Long Term Living to begin the Department's resolution process concerning the report contents. The staff from the Office of Long Term Living may be in contact with you to follow up on the corrective actions taken to comply with the report's recommendations.

I would like to extend my appreciation for the courtesy and cooperation extended to my staff during the course of the fieldwork.

If you have any questions concerning this matter, please contact David Bryan, Manager of the Audit Resolution Section, at (717) 783-7217.

Sincerely,

A handwritten signature in black ink that reads "Tina L Long". The signature is written in a cursive, flowing style.

Tina L. Long, CPA
Director

Enclosure

c: Ms. Karen Deklinski
Ms. Bonnie Rose
Mr. Michael Hale
Ms. J. Diane BrannonNordtomme

bc: Mr. Alexander Matolyak
Ms. Olayemi Gbadamosi
Mr. David Bryan
Mr. Lane Klobucar
Mr. Michael A. Sprow
Ms. Shelly Lawrence
CFO Audit File (C2000)



October 31, 2013

The Honorable Beverly Mackereth
Secretary of the Department of Public Welfare
Health & Welfare Building, Room 333
Harrisburg, Pennsylvania 17120

Dear Secretary Mackereth:

The Bureau of Financial Operations (BFO) conducted an audit of ComForcare Senior Services (ComForcare) at the request of the Office of Long Term Living (OLTL). The audit was designed to analyze documentation that supports payments from the Provider Reimbursement and Operations Management Information System (PROMISE) for client care, and make any recommendations.

This report is in final form and contains ComForcare’s views on the findings and recommendations. ComForcare’s response to the draft audit is included as Appendix B.

Executive Summary

FINDING	SUMMARY
<p>Issue No. 1 – Errors Existed in PROMISE Billings and Payroll</p>	<p>Numerous errors resulted in:</p> <ul style="list-style-type: none"> • Net PROMISE underpayments of \$223. • Underpayment of \$913 to three employees.
HIGHLIGHTS OF RECOMMENDATIONS	
<p>ComForcare should:</p> <ul style="list-style-type: none"> • Develop and use a document to control billing to PROMISE and posting to their payroll system; • Adhere to procedural and computer controls, and implement review procedures. • Pay \$913 to the three employees. <p>OLTL should:</p> <ul style="list-style-type: none"> • Ensure that ComForcare and other home care and health care agencies have access to or receive copies of the Aging clients’ Social Assistance Management System (SAMS) reports. 	

OBSERVATION

When feasible, OLTL and the Office of Developmental Programs (ODP) inspectors should rely on the certain aspects of provider monitoring performed by the Pennsylvania Department of Health's (DOH) licensing inspections

See Appendix A for the Background, Objective, Scope and Methodology, and Conclusion on the Objective.

Results of Fieldwork

Issue No. 1 – Errors Existed in PROMISe Billings and Payroll

The auditors reviewed supporting documentation for PROMISe payments for the audit period (April 1, 2011 to September 15, 2012) for 12 of ComForcare's 33 clients that are approved to receive personal assistance services authorized under various waiver programs.

ComForcare utilizes a form called a "flowsheet" where employees record their time with a client, the services that were performed, and a narrative describing the services provided. The flowsheet is to be signed by the employee and the client.

There were numerous errors with the documentation and billing for all 12 clients; the net effect is ComForcare was underpaid by \$223. The types of errors and overpayments/ (underpayments) are shown below:

Missing flowsheets	\$996
Hours billed differed from flowsheet hours	(\$1,542)
Unbilled hours	(\$257)
Flowsheet a copy of another week	\$304
Billed with wrong code	(\$81)
Billed in excess of approved units	\$162
Hours billed differed from Client Schedule	
Billing Verified report	\$396
Errors in certain payment amounts in the PROMISe System	(\$201)

Total	(\$223)

These errors were caused by ComForcare staff bypassing established procedures, not using source documents (i.e. the flowsheet), and a lack of independent review.

ComForcare's source document for billing PROMISe is the Client Schedule Billing Verified report. The report is developed by entering, prior to service, the employee's scheduled time, by client, by date and time. However, for the clients we examined, ComForcare overbilled a net of 95 units between what was recorded on the Client Schedule Billing Verified report and the time recorded on the flowsheets. These discrepancies net to the \$396 shown above.

ComForcare Senior Services
April 1, 2011 to September 15, 2012

The Client Schedule Billing Verified report is linked to ComForcare's payroll system. Unless it is updated to record the hours of service that were actually provided, the service time based on employee scheduling will be posted to the payroll records.

To ensure that employees were paid for the hours worked, we traced the time on their flowsheets to the payroll records for three employees for three months. The BFO identified 12 discrepancies resulting in a net underpayment of \$913 to the three employees. The discrepancies were:

- Incorrect pay rate
- Hours paid were less than hours identified on the flowsheets
- On two occasions, payment was made to the wrong employee

Additionally, there were two payments totaling \$395 that were not recorded in the payroll system.

Among other duties, the ComForcare Chief Operating Officer (COO) is responsible for scheduling staff, verifying flowsheets, preparing payroll, billing PROMISE, and answering the telephone. The COO indicated that:

- She frequently does not change the Client Schedule Billing Verified report if the total hours are correct, even if the actual times and the employees involved are different.
- She accepts improperly completed flowsheets so employees can get paid.
- She accepts flowsheets beyond the established cutoff date so employees can get paid.
- ComForcare does not have access to, nor do they receive copies of the Department of Aging's Social Assistance Management System (SAMS) reports for the Aging clients they serve.
- Some of the payroll deficiencies noted above were based on the advice from an accountant at a now defunct payroll service that ComForcare had used.

Recommendations

The BFO recommends that ComForcare:

- Complete employee work schedules separate from the franchise software to help eliminate billing and payroll errors.
- Verify and certify employees' flowsheets to ensure accuracy.
- Record the actual hours from the employee flowsheets on the Client Schedule Billing Verified report.
- Use the Client Schedule Billing Verified report as a control document so that only hours recorded on that report for a given time period is billed to PROMISE.
- Avoid deviating from established procedures or overriding payroll system controls.
- Pay \$913 to the three employees.
- Establish procedures for the Chief Executive Officer to review PROMISE billing and payroll prior to their submission.

ComForcare Senior Services
April 1, 2011 to September 15, 2012

The BFO recommends that OLTL:

- Ensure that ComForcare and other home care and health care agencies have access to or receive copies of the Aging clients' SAMS reports.

OBSERVATION

The DOH, Division of Home Health (DHH) is responsible for licensing Home Health (nursing services) and Home Care (personal care and other non-skilled services) agencies. The providers of OLTL and ODP waiver services would fall under these categories.

At least once every three years, examiners from DHH perform on-site licensing inspections of the Home Health and Home Care agencies. Their inspections include the review of personnel documentation, policies and procedures, and client case files. OLTL and ODP review similar items when perform their monitoring visits.

When feasible, OLTL and ODP monitors should rely on the DOH licensing inspections. The BFO recommends that OLTL and ODP coordinate with DOH so that reliance can be placed on the DOH inspections. This would help to ensure that duplicate monitoring procedures are not being performed. The BFO provided the link to DOH's on-line inspection and complaint reports to the OLTL and ODP staff.

Exit Conference and ComForcare Response

ComForcare did not request an exit conference. ComForcare did prepare a response, in which it accepted the findings in the draft report. As such, no changes were made to the report.

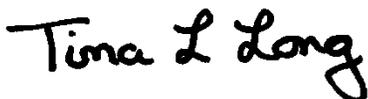
In accordance with our established procedures, an audit response matrix will be provided to OLTL. Once received, OLTL staff should complete the matrix within 60 days and email the Excel file to the DPW Audit Resolution Section at:

RA-pwauditresolution@pa.gov

The response to each recommendation should indicate OLTL's concurrence or non-concurrence, the corrective action to be taken, the staff responsible for the corrective action, the expected date that the corrective action will be completed, and any related comments.

Please contact David Bryan, Audit Resolution Section, at (717) 783-7217 if you have any questions concerning this audit or if we can be of any further assistance in this matter.

Sincerely,



Tina L. Long, CPA
Director

COMFORCARE SENIOR SERVICES

APPENDIX A

Appendix A

Background

ComForcare Senior Services is a corporate organization located in Bloomfield Hills, Michigan that franchises its operations in exclusive geographic areas. It currently has franchises in 29 states, Canada and the United Kingdom.

The corporate organization provides proprietary software to its franchises that includes caregiver and client scheduling, billing, payroll, and other functions. It also provides marketing assistance and programmatic resources to aid in the care of the elderly.

The ComForcare franchise the BFO audited has its headquarters in Harrisburg, Pennsylvania and serves clients in Cumberland, Dauphin and Lebanon counties. It is a for-profit corporation that was incorporated under the name Bry & Wms Medical, Inc. in 2006. Payments through the PROMISe system to Bry & Wms Medical, Inc. totaled \$748,072 for the period April 1, 2011 through September 15, 2012.

Objective, Scope and Methodology

Our audit objective was:

- To verify the accuracy of the PROMISe claims paid from April 1, 2011 through September 15, 2012 met the documentation and other program standards/requirements for reimbursement.

Government auditing standards require that we obtain an understanding of management controls that are relevant to the audit objectives described above. The applicable controls were examined to the extent necessary to provide reasonable assurance of their effectiveness.

Based on our understanding of the controls, certain material deficiencies came to our attention. Areas where we noted material deficiencies or an opportunity for improvement in management controls are addressed in the findings of this report.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Our fieldwork was performed intermittently between December 10, 2012 and June 6, 2013. A closing conference was held with ComForcare management on June 6, 2013 to discuss the results of the audit. This report will be available for public inspection.

Conclusion on the Objective

In conclusion, ComForcare did not always meet the documentation and other program standards/requirements for reimbursement for PROMISe claims paid from April 1, 2011 through September 15, 2012. However, the net effect of these deficiencies was minimal.

**COMFORCARE SENIOR SERVICES
RESPONSE TO THE DRAFT REPORT
APPENDIX B**

Appendix B



Ms. Olayemi Gbadamosi, Audit Manager
Department of Public Welfare
Bureau of financial Operations
Division of Audit and Review
DGS Annex, Hilltop Building, Room 212
3 Ginko Drive
Harrisburg Pa 17110

I am responding to final draft to the performance audit report as prepared by the Division of Audit Review (DAR). The report covered the period April 1, 2011 to September 15, 2012.

I have talk to Auditor Lane Klobucar my final report and accept its findings as a final report.

Dwindal Toliver
ComForcare Home Care Services
2330 Vartan Way
Harrisburg, Pa 17110