

Van Buren Triple
J. Monitoring Assessment Tool – Title XX CFDA# 93.667

Background:

Authorization:

Social Security Act, Title XX, as amended; Omnibus Budget Reconciliation Act of 1981, as amended, Public Law 97-35; Jobs Training Bill, Public Law 98-8 and 473; Medicaid and Medicare Patient and Program Act of 1987; Omnibus Budget Reconciliation Act of 1987, Public Law 100-203; Family Support Act of 1998, Public Law 100-485; Omnibus Budget Reconciliation Act of 1993, Public Law 106-66, 42 U.S.C 1397 ET seq.

Objectives:

To enable each State to furnish social services best suited to the needs of the individuals residing in the State. Federal block grant funds may be used to provide services directed toward one of the following five goals specified in the law: (1) To prevent, reduce, or eliminate dependency; (2) to achieve or maintain self-sufficiency; (3) to prevent neglect, abuse, or exploitation of children and adults; (4) to prevent or reduce inappropriate institutional care; and (5) to secure admission or referral for institutional care when other forms of care are not appropriate

Title XX is also known as the Social Services Block Grant (SSBG). ODJFS prepares a Title XX state plan outlining the services that may be provided with such monies. Each Ohio county is required to prepare a similar plan outlining their use at the county level. Title XX funds should be expended within the context of the state plan, the county plan, and applicable federal rules. Title XX, unlike other HHS programs, is not subject to the grants management common rule, 45 CFR 92.

Uses and Use Restrictions:

Federal funds may be used by States for the proper and efficient operation of social service programs. Except for items (1) and (4) below, for which a waiver from the Secretary may be requested, Federal funds cannot be used for the following: (1) The purchase or improvement of land, or the purchase, construction, or permanent improvement of any building or other facility; (2) the provision of cash payments for costs of subsistence or the provision of room and board (other than costs of subsistence during rehabilitation, room and board provided for a short term as an integral but subordinate part of a social service, or temporary shelter provided as a protective service); (3) the payment of wages to any individual as a social service (other than payment of wages to welfare recipients employed in the provision of child day care services); (4) the provision of medical care (other than family planning services, rehabilitation services or initial detoxification of an alcoholic or drug dependent individual) unless it is an integral but subordinate part of a social service for which grants may be used; (5) social services (except services to an alcoholic or drug dependent individual or rehabilitation services) provided in and by employees of any hospital, skilled nursing facility, intermediate care facility, or prison, to any individual living in such institution; (6) the provision of any educational service which the State makes generally

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available to its residents without cost and without regard to their income; (7) any child day care service unless such service meets applicable standards of State and local law; (8) the provision of cash payments as a service; or (9) for payment for any item or service (other than an emergency item or service) furnished by an individual or entity during the period when such individual or entity is excluded pursuant to Section 1128 or Section 1128(A) of the Social Security Act from participation in this program; or at the medical direction or on the prescription of a physician during the period when the physician is excluded based on Section 1128 or 1128(A) from participation in the program and when the person furnishing such item or service knew or had reason to know of the exclusion (after a reasonable time period after reasonable notice has been furnished to the person). A State may transfer up to 10 percent of its allotment for any fiscal year to the preventive health and health services, alcohol and drug abuse, mental health services, maternal and child health services, and low-income home energy assistance block grants.

Review Objectives:

- To determine whether evidence of program eligibility is present;
- To determine whether costs charged to the program are allowable; and
- To determine whether costs are properly recorded.

Procedures:

	Program Step	Date/ Initials	Work Paper Reference
1.	<u>General</u> Inquire of management as to their policies for the use of Title XX monies, and obtain a copy of their Title XX profile and any agency policies which document eligibility for services, etc. if the county agency has established its own Title XX eligibility requirements for specific services (i.e., homemaker)		
2.	Obtain from the agency a listing of contracts and subgrants. Such a list may have been obtained during procurement testing.		
3.	<u>Contracts Charges</u> From the list of county contracts and subgrants, select a contract for goods or services the cost of which is directly charged to the Title XX program and not related to foster care services. Review the contract to determine whether: <ul style="list-style-type: none"> • The goods or services were used for a Title XX allowable activity; and • The goods or services were allowable under the terms of the county's Title XX profile and comprehensive plan. 		

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	Program Step	Date/ Initials	Work Paper Reference
	<p>Complete a sample reference document outlining your approach and the completeness of your population for sampling purposes, include detail testing noted in Step #4 below.</p>		
4.	<p>Select one invoice that was paid under the contract and determine whether:</p> <ul style="list-style-type: none"> • The goods or services invoiced were provided and are within the context of the contract deliverables; • The invoiced goods or services were provided within the contract term; • The invoice was mathematically correct and the charges agreed with the contract (e.g., unit rate); • The goods or service meet the program needs; and • The payment made matched the invoice amount and was charged to the proper financial code. <p>If any individual eligibility criteria exist for the services provided, from the invoice reviewed, select two recipients and verify the documentation supports their eligibility.</p>		
5.	<p>From the list of county contracts and subgrants, select a contract for goods or services the cost of which is directly charged to the Title XX program and is related to foster care services. Review the contract to determine whether:</p> <ul style="list-style-type: none"> • The goods or services are related to a residential treatment facility and are allowable to the Title XX program; • The goods or services were allowable under the terms of the county's Title XX profile and comprehensive plan. <p>Complete a sample reference document outlining your approach and the completeness of your population for sampling purposes.</p>		
6.	<p>Select one invoice related to the foster care contract for detail testing. From the invoice, select five children whose care and maintenance were charged to Title XX and determine whether:</p> <ul style="list-style-type: none"> • The services provided were residential treatment services; • Case file documentation exists to demonstrate that payment of any placement and maintenance costs is secondary to the need for medical care and treatment, or an otherwise allowable Title XX activity; • The goods or services invoiced were provided and are within the context of the contract deliverables; • The invoiced goods or services were provided within the 		

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	Program Step	Date/ Initials	Work Paper Reference
	<p>contract term;</p> <ul style="list-style-type: none"> • The invoice was mathematically correct and the charges agreed with the contract (e.g., unit rate); • The goods or service meet the program needs; and • The payment made matched the invoice amount and was charged to the proper financial code. <p>Note: The county agency may not charge the costs of an entire contract for foster care services to Title XX. If so, identify any invoices charged to Title XX which relate to a Title IV-E Foster Care Provider Contract and perform the above test.</p>		
7.	<p><u>Non-Contract Charges</u> Select two invoices, the costs of which were directly charged to the Title XX program codes. Review the invoices to determine whether:</p> <ul style="list-style-type: none"> • The goods or services invoiced were provided; • The invoices were mathematically correct; • The goods or services were used for a Title XX allowable activity; • The goods or services were allowable under the terms of the county's Title XX profile; • The goods or services were allowable under 2 CFR 225; • The goods or service meet the program needs; and • The payment made matched the invoice amount and was charged to the proper financial code. <p>If any individual eligibility criteria exist for the services provided, from the invoice reviewed, select two recipients and verify the documentation supports their eligibility.</p>		
8.	<p>Conclusion:</p> <p>Consider whether there are any instances of non compliance or a systemic problem due to a lack of adequate internal control exists with regards to your procedures. If so, make an appropriate notation as an Issue in Auto Audit.</p> <p>Prepare a segment summary to reflect work completed and results of your testing. (Note: An example index/segment summary can be obtained from the Auto Audit Library.)</p>		