



CliftonLarsonAllen

November 9, 2017

Colorado Department of Human Services – State Unit on Aging
1575 Sherman St.
Denver, CO 80203

We have concluded our professional assessment of the Area Agencies on Aging in Colorado and appreciate the opportunity to serve you. This assessment, which focused on the financial and operating practices was agreed to by the Colorado Department of Human Services and applied solely to assist the Colorado Department of Human Services. The management of the Colorado Department of Human Services is solely responsible for the financial and operating practices of its organization. We performed this engagement based on the American Institute of Certified Public Accountants Statements on Standards for Consulting Services. The sufficiency of the procedures is solely the responsibility of management of the Colorado Department of Human Services. Consequently, we make no representations regarding the sufficiency of the procedures performed either for the purpose for which this report has been requested or for any other purpose.

Our engagement to perform these procedures was conducted as a consulting assessment. Because our procedures did not constitute an audit performed in accordance with auditing standards generally accepted in the United States of America; or an examination, review, or agreed upon procedures performed under the attestation standards of the American Institute of Certified Public Accountants, we do not express an opinion on any of the specified elements, accounts or items included in the State of Colorado's financial statements or on the financial statements taken as a whole. If we had performed additional procedures, or if we had conducted an examination or review of the specified elements, accounts or items of the financial statements, or agreed upon procedures in accordance with professional standards, matters in addition to our findings might have come to our attention and been reported to you.

The procedures performed and related observations and recommendations are described in the attached document. We performed our procedures in June, July, and August 2017.

This report is intended solely for the use of the management of the Colorado Department of Human Services and should not be used by others.

CliftonLarsonAllen LLP

CliftonLarsonAllen LLP

Broomfield, Colorado

Statewide Report on Selected Area Agency on Aging Site Visits

Area Agency on Aging (AAA) locations selected for review by the Colorado Department of Human Services – State Unit on Aging included:

- Region 1 – Northeastern Colorado Association of Local Governments
- Region 2B – Weld County AAA
- Region 3A – Denver Regional Council of Governments
- Region 4 – Pikes Peak Area Council of Governments
- Region 6 – Lower Arkansas Valley AAA
- Region 8 – South-Central Colorado Seniors Inc. AAA
- Region 9 – San Juan Basin AAA
- Region 10 – League for Economic Assistance & Planning
- Region 11 – Association of Governments of Northwest Colorado
- Region 12 – Northwest Colorado Council of Governments
- Region 13 – Upper Arkansas AAA
- Region 14 – South Central Council of Governments

A. Entrance Conference

CLA conducted entrance conferences at each of the AAA locations with the AAA's personnel to discuss the processes and methodologies of each AAA.

B. Service Rate Testing

During the site visit with each AAA, CLA reviewed the AAA's methodology for determining the service unit costs. The narrative of each AAA's methodology and how the AAA obtains a competitive rate was included in the individual AAA site visit summaries delivered to CDHS for each AAA reviewed. The following observations were made in relation to the methodology for service unit costs:

Northwest Colorado Council of Governments: The AAA reimburses providers based on costs incurred by the provider, rather than on a fixed cost per service unit. The AAA indicated that the reason for this reimbursement methodology is that the AAA has a difficult time finding providers that are willing to cover their region. As noted in Section D below, this AAA's calculated cost per unit for Congregate Meals and Home Delivered Meals for March 2017 was significantly greater than the statewide average. CLA notes that the March 2017 cost per unit could be greater due to the timing of costs incurred, higher fixed costs compared to a low number of individuals served, or could be greater due to the service rate methodology used by the AAA. See additional information on the service rates for this AAA in Section D.

Association of Governments of Northwest Colorado: The AAA reimburses providers based on costs incurred by the provider, rather than on a fixed cost per service unit. The AAA structures the agreement between the AAA and the provider as a grant agreement for reimbursement of costs, rather than as a vendor relationship. The structure of these agreements have been noted as an observation in Section G. CLA noted that this AAA has larger calculated costs per unit for March 2017 compared to the statewide average for all service categories reviewed. CLA notes that the March 2017 cost per unit could be greater due to the timing of costs incurred, higher fixed costs compared to a low number of individuals served, or could be greater due to the service rate methodology used by the AAA. See additional information on the service rates for this AAA in Section D.

South Central Council of Governments: For the Family Caregiver Respite Care service, the AAA requests reimbursement for \$17 per service unit provided in addition to an allocation of administrative costs. CLA noted that this methodology was inconsistent, as the \$17 per service unit did not represent actual costs incurred by the AAA but rather an estimated charge rate per service unit.

CLA noted that in regions with limited competition between providers, a request for proposal process for providers that focuses on budgeted costs rather than on the cost per service unit would incentivize providers to increase budgeted costs and decrease the budgeted service units to be provided to increase the reimbursement per unit. In addition, as providers are required to show documentation showing expenditures exceed reimbursements, there is additional incentive to allocate additional expenses to AAA activity. CLA notes that changing the service unit rate methodology in rural regions may result in decreased costs per service unit.

Review of Contracts with Providers

As part of the work plan's procedures for reviewing the methodology and supporting documentation for service rates, CLA requested the contracts between the AAA and the provider for the selected services. Relating to the review of the contracts between AAAs and providers, CLA made the following observation:

San Juan Basin AAA: The AAA was unable to provide the contract between the AAA and one of the provider's. For CLA's testing purposes, the cost per unit information for this provider was obtained from the AAA's contract management software (OAA-SYS).

For all of the other contracts between AAAs and providers reviewed, CLA noted that the amount agreed upon for the rate of reimbursement in the contract was the same as what was used in calculating reimbursement in CBRES.

Review of Provider Financial Statements

As part of the work plan's procedures for reviewing the methodology and supporting documentation for service rates, CLA requested the most recent financial statements available for the provider to review the provider's total expenditures relating to AAA activity compared to the provider's total revenue relating to AAA activity. Relating to the review of the provider's most recent financial statements, CLA made the following observation:

Lower Arkansas Valley AAA: The AAA was unable to provide the cash receipt policies for all providers used by the AAA.

For all of the provider financial statements reviewed, CLA noted that total expenditures exceeded total revenues relating to AAA activity. CLA noted that the provider financial statements reviewed were unaudited.

C. Review of Total Revenue by Service

During the site visit with each AAA, CLA reviewed the AAA's methodology for recording revenue in the AAA's financial system. The narrative of each AAA's methodology was included in the individual AAA site visit summaries delivered to CDHS for each AAA reviewed. CLA obtained a report from each AAA showing the revenues and expenditures relating to AAA activity for March 2017. CLA compared the revenues and expenditures on this report and noted that total expenditures relating to AAA activity were greater than or equal to total revenue for each AAA for March 2017. Relating to the review of the AAA's general ledger detail relating to revenue and expenditures for AAA activity, CLA made the following observation:

Lower Arkansas Valley AAA: The AAA segregates AAA activity from other types of activity in its financial system, but does not track each service separately in the general ledger.

D. Summarize Service Unit Rates

CLA compiled the March 2017 cost per unit information by service and region into a summary spreadsheet, which was provided to CDHS. The service unit rates are presented in graphs in Appendix B and Appendix C. Appendix B presents a separate graph for each AAA with a comparison of the AAA's March 2017 cost per unit compared to the statewide cost per unit average. Appendix C presents scatter point graphs showing cost per unit compared to the number of units provided. The outliers visually represented in Appendix C are noted below.

Cost Per Unit Outliers:

Assisted Transportation:

Pikes Peak Area Council of Governments: The cost per service unit for Park County Senior Coalition was \$49.92 to provide 56 units of Assisted Transportation service in March 2017. Per discussion with PPACG AAA Director, Park County Senior Coalition's transportation and assisted transportation costs per unit are greater than other providers due to the rural location this provider services. The provider indicated that since one unit of transportation service is defined as one trip, the cost per unit is much greater than other locations as distances from a rural location can be significantly longer. In addition, some of the roads required to be used are dirt roads, which can lead to additional maintenance expenses. Noted that this provider's budgeted costs were 7% of the AAA's total Assisted Transportation budgeted costs for all providers and consisted of 2% of the AAA's total budgeted service units for Assisted Transportation.

Transportation:

Pikes Peak Area Council of Governments: The cost per service unit for Park County Senior Coalition was \$89.55 for reimbursement of Transportation service units. Noted that this provider had already exceeded their budgeted units prior to March 2017 and did not receive reimbursement for Transportation services provided in March. Per discussion with the PPACG AAA Director, Park County Senior Coalition's transportation and assisted transportation costs per unit are greater than other providers due to the rural location this provider services. The provider indicated that since one unit of transportation service is defined as one trip, the cost per unit is much greater than other locations as distances from a rural location can be significantly longer. In addition, some of the roads required to be used are dirt roads, which can lead to additional maintenance expenses. Noted that this provider's budgeted costs were 16% of the AAA's total Assisted Transportation budgeted costs for all providers and consisted of 3% of the AAA's total budgeted service units for Transportation.

Association of Governments of Northwest Colorado: The cost per service unit for Routt County was \$131.28 to provide 48 units of Transportation service in March 2017. Noted that this higher rate was due to timing differences between SAMS and CBRES, where actual March service units provided were 183, but the number in SAMS for March was 48. The remaining service units were shown in the April CBRES report. Based on the March 2017 CBRES report, CLA noted that that this AAA's year-to-date cost per unit rate for Transportation is \$9.13 as reimbursed from Federal Part B, and \$8.27 cost per unit reimbursed from the State. The year-to-date cost per units in CBRES as of March 2017 are in line with the statewide average.

Case Management:

Association of Governments of Northwest Colorado: The cost per service unit for Garfield County was \$136.63 to provide 30 units of Case Management service in March 2017. This AAA reimburses providers on a cost reimbursement basis rather than on a reimbursement per service unit basis. The AAA does not review supporting documentation for costs submitted on a monthly basis. Based on the March 2017 CBRES report, this AAA's year-to-date cost per unit average for this service is 143.82, including reimbursement from both State and Federal.

Family Caregiver Respite Care:

Association of Governments of Northwest Colorado: The cost per service unit for Garfield County was \$79.08 to provide 12 units of Family Caregiver Respite Care service in March 2017. This AAA reimburses providers on a cost reimbursement basis rather than on a reimbursement per service unit basis. The AAA does not review supporting documentation for costs submitted on a monthly basis. Based on the March 2017 CBRES report, this AAA's year-to-date cost per unit average for this service is \$82.77.

Association of Governments of Northwest Colorado: The cost per service unit for Senior Daybreak of Hilltop was \$73.07 to provide 207 units of Family Caregiver Respite Care service in March 2017. This AAA reimburses providers on a cost reimbursement basis rather than on a reimbursement per service unit basis. The AAA does not review supporting documentation for costs submitted on a monthly basis. Based on the March 2017 CBRES report, this AAA's year-to-date cost per unit average for this service is \$82.77.

Congregate Meals:

Northwest Colorado Council of Governments: The cost per service unit for Pitkin County was \$87.78 to provide 105 units of Congregate Meals service in March 2017. This AAA reimburses providers on a cost reimbursement basis rather than on a reimbursement per service unit basis. The March 2017 cost per unit for this provider was greater than the year-to-date average for this provider due to the timing of expenditures. As of March 2017, this provider's year-to-date average cost per unit was \$9.73, calculated based on supporting documentation received from the AAA. Based on the March 2017 CBRES report, this AAA's year-to-date cost per unit average for this service is \$13.68. The year-to-date average for this provider and year-to-date average based on CBRES are in line with the statewide average for this service.

Home Delivered Meals:

Northwest Colorado Council of Governments: The cost per service unit for Grand County was \$39.17 to provide 150 units of Home Delivered Meals service in March 2017. This AAA reimburses providers on a cost reimbursement basis rather than on a reimbursement per service unit basis. The AAA does not review supporting documentation for costs submitted on a monthly basis. Based on the March 2017 CBRES report, this AAA's year-to-date cost per unit average for this service is \$30.16, which is still an outlier from the statewide average.

Northwest Colorado Council of Governments: The cost per service unit for Pitkin County was \$50.65 to provide 87 units of Home Delivered Meals service in March 2017. This AAA reimburses providers on a cost reimbursement basis rather than on a reimbursement per service unit basis. The AAA does not review supporting documentation for costs submitted on a monthly basis. Based on the March 2017 CBRES report, this AAA's year-to-date cost per unit average for this service is \$30.16, which is still an outlier from the statewide average.

Comparability of Transportation Service Units

CLA noted that Transportation service units are measured as a "one way trip" which can lead to inconsistency in the cost per unit, as a "one way trip" can be a range of costs depending upon the length of the trip. It was noted that the Transportation service unit costs were greater in more rural areas, where the one way trips are likely across greater distances than in urban areas. CLA recommends CDHS consider measuring Transportation service units in miles to have greater consistency between regions or request AAAs retain supporting documentation for providers incurring significantly longer one way trips.

E. Reimbursement Testing

During the site visit with each AAA, CLA documented the methodology used by the AAA to input requests for reimbursement into CBRES, including descriptions of the supporting documentation retained for each reimbursement request. The narrative of each AAA's methodology was included in the individual AAA site visit summaries delivered to CDHS for each AAA reviewed. CLA agreed the amount of the March 2017 reimbursement in CBRES to amounts recorded in each AAA's financial system. CLA had no additional observations or recommendations based on the procedures performed from the work plan during reimbursement testing for each AAA.

F. Review of Cash Controls

Review of Cash Receipt Policies and Procedures

As part of CLA's procedures over reviewing cash controls, CLA obtained the written cash receipt policies and procedures for the AAA and each provider used by the AAAs. CLA compared the cash receipt policies for each AAA and provider to the requirements in 12 CCR 2510-1 10.308.2. Based on comparison of the policies, CLA made the following observations:

San Juan Basin AAA: The AAA was unable to provide the cash receipt policies for all providers used by the AAA.

Pikes Peak Area Council of Governments: One provider's policies did not contain a requirement for two individuals to count and document the amount of cash receipts.

Denver Regional Council of Governments: One provider's policies allowed for cash receipts by program individuals, which did not include a requirement for a dual count of cash receipts. Two other provider's policies contained appropriate procedures for cash receipts received by check but did not address procedures for cash donations.

No additional observations or recommendations were made for the other AAAs. The observations noted above are based on review of the written policies and procedures of the AAA and the AAA's providers. The work plan did not include a walkthrough to compare that the AAA and providers are following their written policies, which may have resulted in additional observations and recommendations.

Review of Supporting Documentation for March 2017 Cash Receipts

CLA reviewed the supporting documentation for March 2017 cash receipts for each AAA and each provider used by the AAAs. CLA agreed the total of the supporting documentation to the total of program income reported to CDHS through CBRES. Based on review of the supporting documentation and comparison of the total cash receipts to CBRES, CLA made the following observations:

San Juan Basin AAA: The AAA was unable to provide the supporting documentation for cash receipts for March 2017.

South Central Council of Governments: The AAA was unable to provide the supporting documentation for cash receipts for March 2017.

No additional observations or recommendations were made for the other AAAs. As program income reduces the amount of reimbursement to the AAA or providers, CLA notes that the AAA or provider would have financial incentive to underreport the amount of program income. The procedures performed by CLA were designed to substantiate the existence and accuracy of cash receipts reported, but likely would not detect errors in the completeness of the cash receipts reported.

G. Other Observations

Review of Service Units Entered by Providers in SAMS

The State Unit on Aging Policy and Procedure Manual requires that AAAs to perform on-site provider assessments which shall include review of “sample case files (selected randomly by AAAs” and review of “service data entry records for reconciliation with billing documentation”. While there is a requirement for an annual assessment that includes review of supporting documentation, CLA recommends that CDHS perform a cost benefit analysis on whether a monthly review of service units by providers should be a requirement for AAAs to increase controls over the risk of reimbursement to providers for services that were not delivered or performed.

CDHS would have numerous options on how to implement a requirement for monthly review of service units, and would need to consider the associated costs and potential benefits when implementing a requirement for monthly review. To adequately mitigate the risk of improper reimbursement, CDHS would need to define the specific supporting documentation that would be required for each service provided, such as a signature by the customer for each service provided or electronic record of a customer specific PIN being entered or ID card being swiped. Ideally, this supporting documentation would require a minimal amount of additional effort while still reducing the risk of forgery or error to an appropriate level. Depending on the supporting documentation required per customer, CDHS could then require a specific number or percentage of service units be reviewed by the AAA.

Employee Minimum Wage

South-Central Colorado Seniors Inc. AAA: During review of the supporting documentation for expenditures, CLA noted that one employee was being paid \$9 per hour, which was below Colorado’s minimum wage of \$9.30 due to a typographical error in the payroll system. The AAA indicated that they would correct the wage rate within the payroll system and rectify previous wages with the employee.

Employee Timesheets

Northeastern Colorado Association of Local Governments: During review of the supporting documentation for cost reimbursement, it was noted that there were differences between the employee timesheets and the hours used in the calculation to determine the employee’s pay. The AAA noted that this was due to a timing difference in when the timesheets are received and when employees are paid, which goes through a reconciliation process in the following month. The AAA indicated that this process would be updated in the future so that the hours in timesheets would be the same as the number of hours used in calculating payroll.

Timing Differences in SAMS

During reimbursement testing described in Section E above, CLA noted timing differences between the SAMS units reported and the costs reported, where the units and costs reported would not always be for the same period. CLA discussed this issue with CDHS personnel, who indicated that this would occur based on the differences in when CBRES pulls in the number of units from SAMS and when the cut-off for entering costs is. As these differences would not have an impact on reimbursement but make reconciling CBRES to supporting documentation more different, CDHS should perform a cost-benefit analysis to determine whether it would be worth configuring CBRES and SAMS to use the same dates for units and expenses.

Agreements with Providers

Association of Governments of Northwest Colorado: During review of the agreement between the AAA and providers, it was noted that the language used in contract referred to a “grant” between the AAA and provider. The AAA should determine if the relationship is a subaward to the provider or if the provider is a vendor for services. If the AAA determines that this is a grantor/grantee relationship, the AAA should request approval from CDHS prior to awarding amounts over the simplified acquisition threshold as required by 2 CFR 200.332.

H. Recommendations

Based on discussions of the observations noted in the steps above with management of the Colorado Department of Human Services, CLA makes the following recommendations:

1. CLA recommends that CDHS work collaboratively with AAAs and providers with unit cost outliers to determine if there are unusual circumstances leading to a higher cost per unit or the possibility of reduced reimbursement per unit in future contracts.
2. CLA recommends that CDHS review the unit measurement for Transportation services to determine if a more consistent measurement can be used in place of one way trips. It was noted that the Transportation service unit costs were greater in more rural areas, where the one way trips are likely across greater distances than in urban areas. CLA recommends CDHS consider measuring Transportation service units in miles to have greater consistency between regions or request AAAs retain supporting documentation for providers incurring significantly longer one way trips.
3. CLA recommends that CDHS implement standardized documentation by service type that is required to be completed by AAAs or providers for each service provided. This documentation would provide additional evidence to support that the service was provided and would provide supporting documentation that could be matched to each service unit entered in SAMS. CLA recommends that CDHS consider implementing a policy that requires monthly review of the documentation for a determined number or percentage of units entered into SAMS.
4. CLA recommends that AAAs work with their providers to enter units into SAMS in a timely manner so that CBRES and SAMS use the same dates for units and expenses. CLA recommends that CDHS review the timing of when CBRES pulls units into SAMS to ensure that the financial information and units entered in CBRES are properly correlated.

Conclusion

CliftonLarsonAllen appreciates the opportunity to provide this consulting service to the Colorado Department of Human Services. We very much appreciate the openness and assistance of the Colorado Department of Human Services staff and each AAA's staff who participated in the interviews as well as those who gathered the requested documentation, which was needed during this engagement. Should additional consulting services be desired by the Colorado Department of Human Services, CliftonLarsonAllen would be pleased to assist in whatever way desired.

Appendix A

Work Plan for Review of the Area Agencies on Aging

Colorado Department of Human Services
 Work Plan for Review of the Area Agencies on Aging

Note: The following is the program with procedures to be completed for each of the 12 AAA's selected

	Workpaper		
Procedures:	Sign off / Date	Reference	Comments

Entrance Conference

- A** Conduct an entrance conference and site visit to each of the 12 AAAs. The Contractor shall interview all key personnel responsible for administering the contracted programs including, but not limited to, staff that are responsible for monitoring service providers and accounting functions.

Note: Interviews and discussions with the AAA will be documented in the steps listed below.

Procedures to be performed for the following services:

1. Congregate Meals
2. Home Delivered Meals
3. Transportation (Assisted and Transportation)
4. Case Management
5. Respite (Caregiver)

Service Rate Testing

- B** Perform testing to ensure that adequate supporting documentation and methodology exists for service unit costs (service rates) billed to CDHS by each of the 12 AAAs and their selected service providers. The Contractor will also ensure that the costs built into the service rates are allowable. The contractor will identify through a risk-based sample approach which service types and which service providers will be selected for testing. The Contractor will consult with State staff, who shall identify the service types and providers to be reviewed.

For each of the five services selected, the following procedures will be performed for March 2017

- 1 Obtain from the AAA a list of all providers for the service.
- 2 Obtain agreements for each provider to determine how payment from the AAA to the provider is determined.
- 3 Document the methodology used by the AAA for obtaining a competitive rate from providers.
- 4 Review supporting documentation for payments made in March 2017. Document the methodology used by the AAA to determine payment to the provider.
 - a If the contract is a cost reimbursement basis, obtain receipts from the provider to support the month's payment
 - b If the contract is a fee for service, obtain the most recent financial statements for the provider and review the payment made for services in comparison to the expenses for that service in comparison with revenue and expenses for other services provided to determine if payment for this service is supporting other services. Also obtain the provider's methodology for determining the service cost (if there is one or if it was just a rate agreed upon in a contract).
- 5 Review that the costs built into the service rates are allowable.

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Review of Total Revenue by Service

- C** Review each AAA's funding streams including: Program Income, In-Kind, local cash, Nutrition Services Incentive Program (NSIP), and federal and state funds to identify the overall cost of the services provided.

For each of the five services selected, the following procedures will be performed for March 2017

- 1 Discuss and document the revenue sources received by the AAA and the methodology used to record revenue.
- 2 Obtain a report from the AAA's financial management system showing the revenue accounts from March 1, 2017 to March 31, 2017 for the sources documented in Step C.1.
- 3 Determine the total amount of revenue from all sources received related to March 2017 services provided for the selected service. Compare the average revenue received per unit of service provided compared to the cost of the service from the provider as determined and documented in Step B above.

Summarize Service Unit Rates

- D** Identify the unit rates for major services across AAAs and providers. The Contractor will identify outliers to the statewide average and determine if additional review of the unit rate is necessary.

For each of the five services selected, the following procedures will be performed for March 2017

- 1 Summarize the unit rates by service in a table for the AAA under review.
- 2 Carry the summary information for that AAA into the summary table for all AAA's.

Appendix A

Work Plan for Review of the Area Agencies on Aging

Reimbursement Testing

- E** Evaluate the financial management system used by the AAAs and providers to determine if those systems conform with the financial management system used by the State (CBRES).

Determine if all awards received and expended by each of the 12 AAAs are traceable, separated by funding source, and properly recorded in the financial management systems maintained by that AAA. The contractor will perform this testing by sampling reimbursements and tracing these through each AAA's financial system.

For ALL awards from CDHS to the AAA, the following procedures will be performed for March 2017

- 1 Document the methodology used by the AAA to input requests for reimbursement into CBRES. Document what reports are used from the AAA's financial management system and any other sources used to determine amounts to be reimbursed.
- 2 Review the reimbursement from CDHS to the AAA related to March 2017 services provided. Agree the amount of the March 2017 reimbursement provided by CDHS to amounts recorded in the AAA's financial system.

Review of Cash Controls

- F** Review cash controls at each AAA to determine if dollars are tracked effectively from service delivery to reimbursement.

For each of the five services selected, the following procedures will be performed for March 2017

- 1 Obtain the AAA's policies and procedures regarding cash collection for providing the service, if applicable.
- 2 Review the cash controls in the policies and procedures for adequacy.
- 3 Review the cash received relating to the service for March 2017 and written supporting documentation for internal controls over the cash received.

Discussion of Exceptions

- G** Perform an audit exception clearing process with each of the 12 AAAs and review the exceptions lists with CDHS staff.

If necessary, hold an exit conference with each of the 12 AAAs to explain any areas of maintained exceptions where there was disagreement.

- 1 Summarize all exceptions, findings, and recommendations into one workpaper. Include description of the circumstances, questioned costs (if applicable), applicable criteria, and recommendation.
- 2 Document discussion of any exceptions, findings, or recommendations with CDHS and the AAA.

Reporting

- H** Provide each of the 12 AAAs with a compliance matrix listing a description of the specific audit exceptions, the questioned costs amount (if any), the applicable criteria, and make a recommended remedy for future compliance.

- 1 Prepare and provide summary report of any exceptions, findings, and recommendations to CDHS and the AAA.

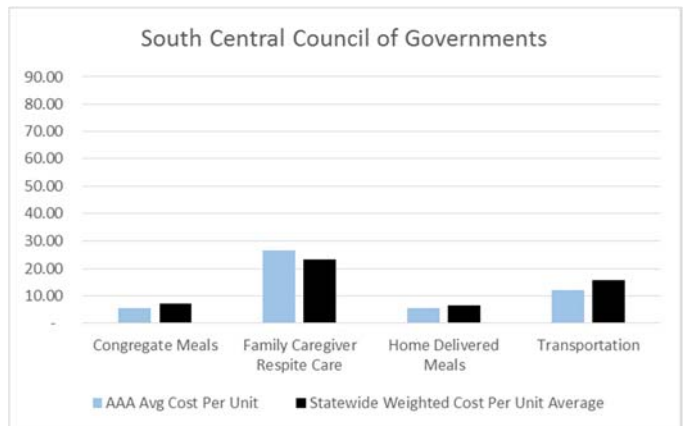
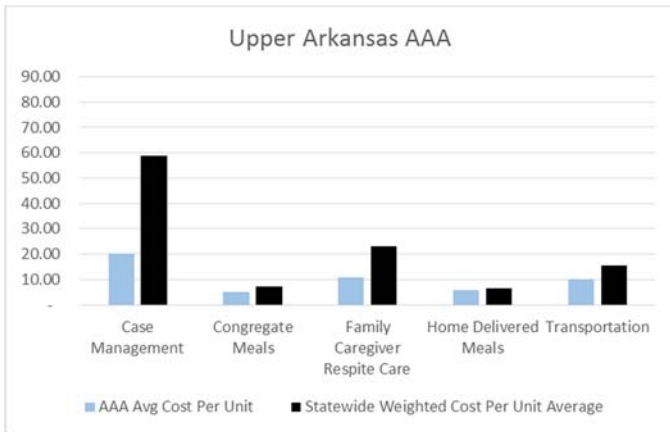
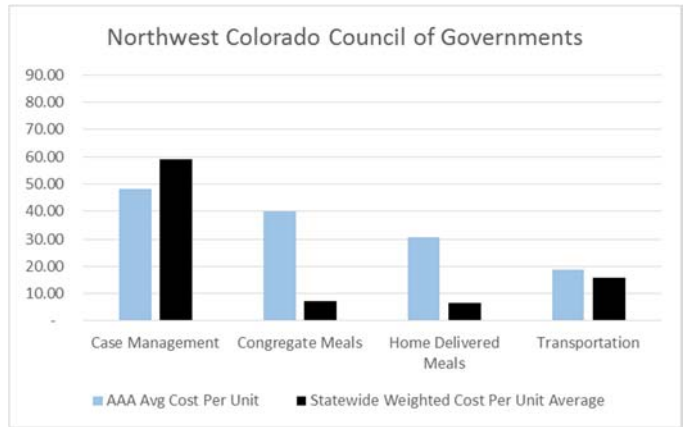
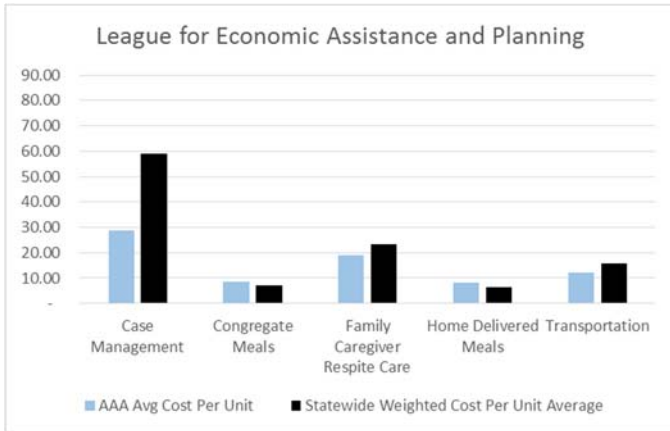
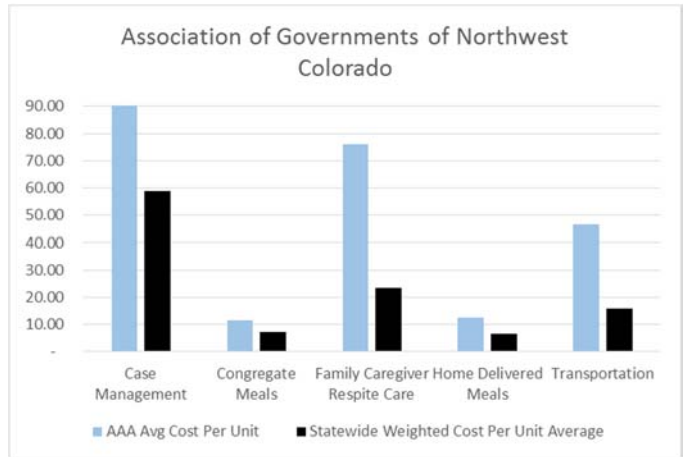
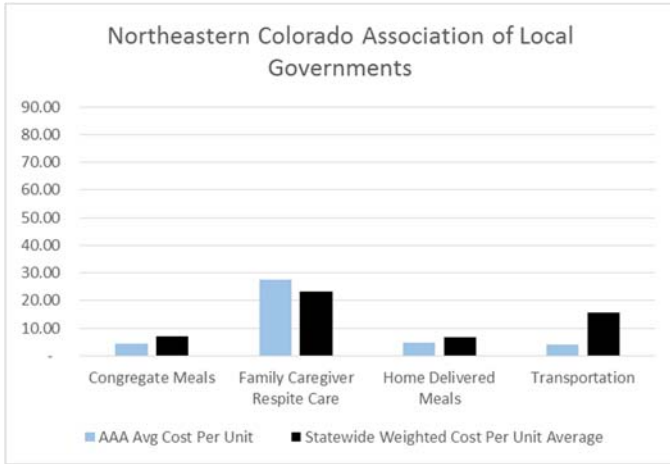
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- I** Prepare a summary report not to exceed 20 pages to be provided to CDHS. The report shall summarize testing areas that were identified as deficient and describe the audit exceptions and questioned costs. The report shall contain recommendations for improvements to CDHS's internal controls, as necessary.

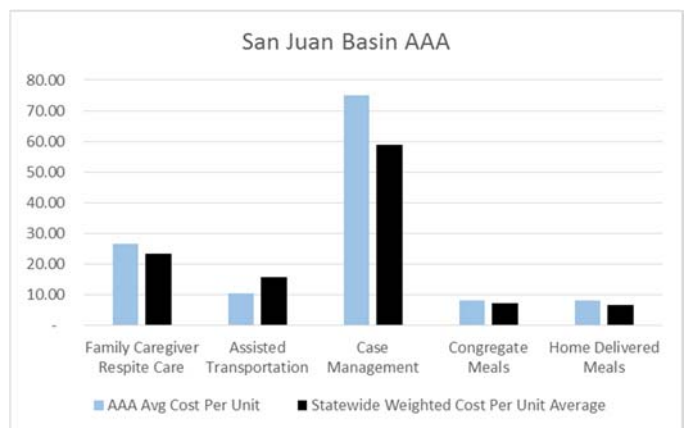
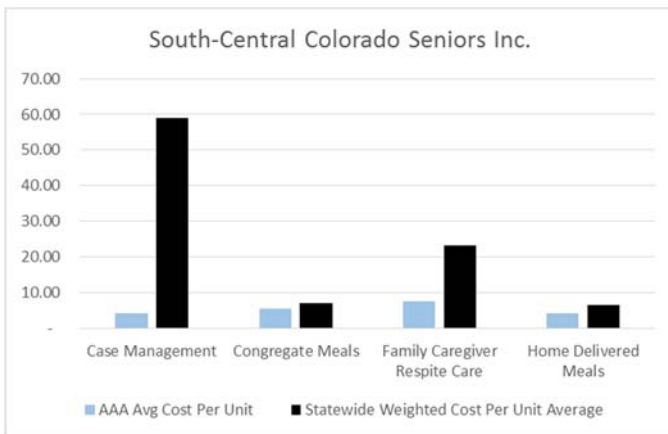
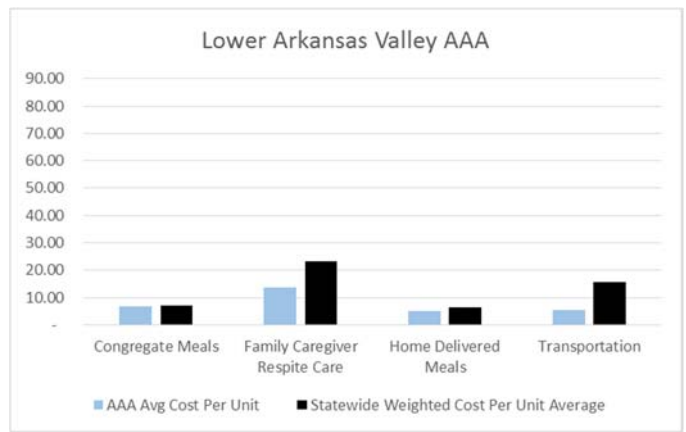
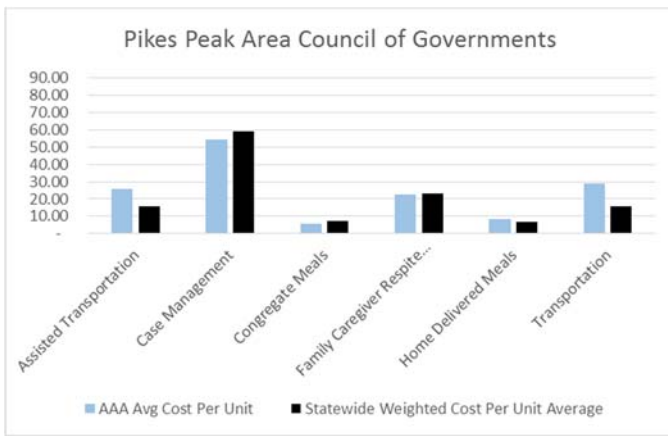
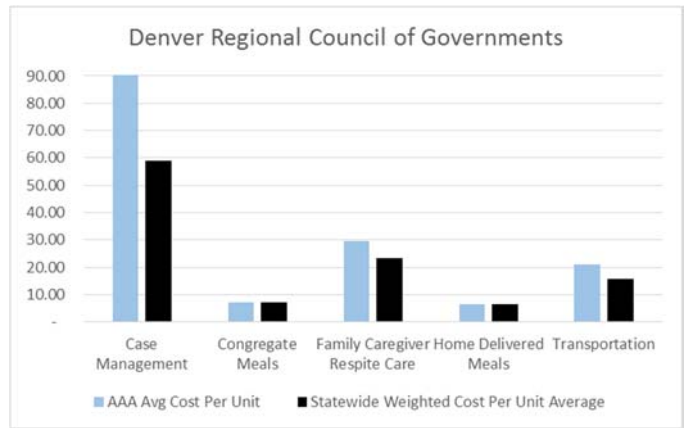
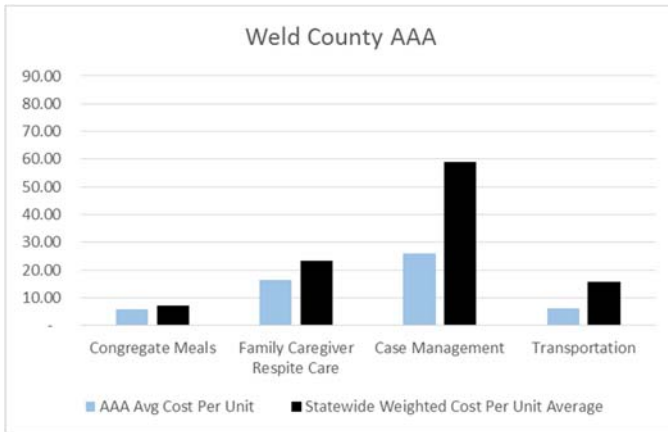
- 1 Summarize information from each individual AAA report into a summary report of all AAA's for CDHS.

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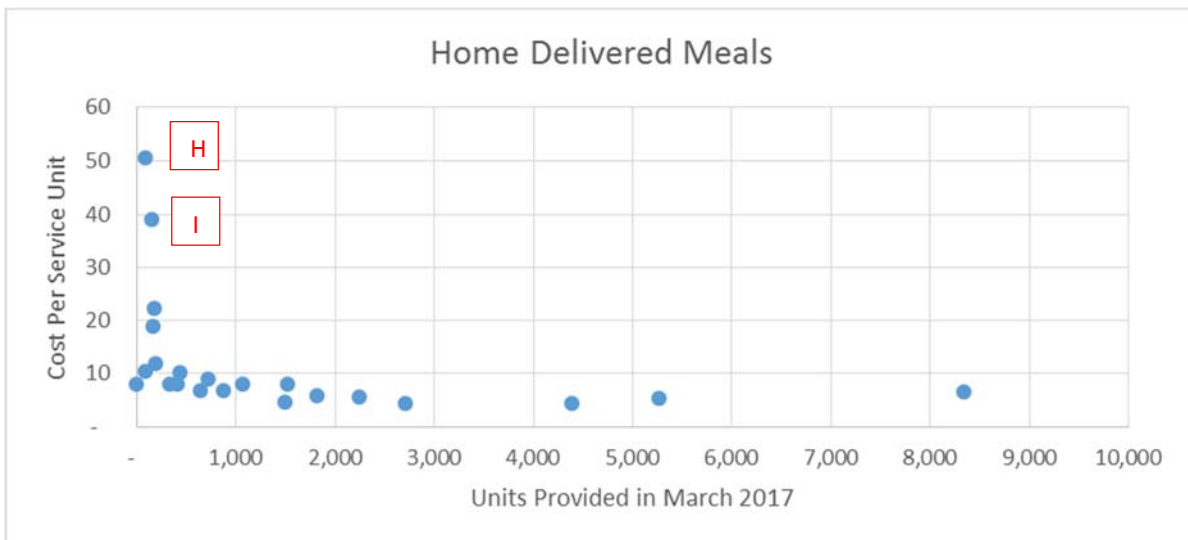
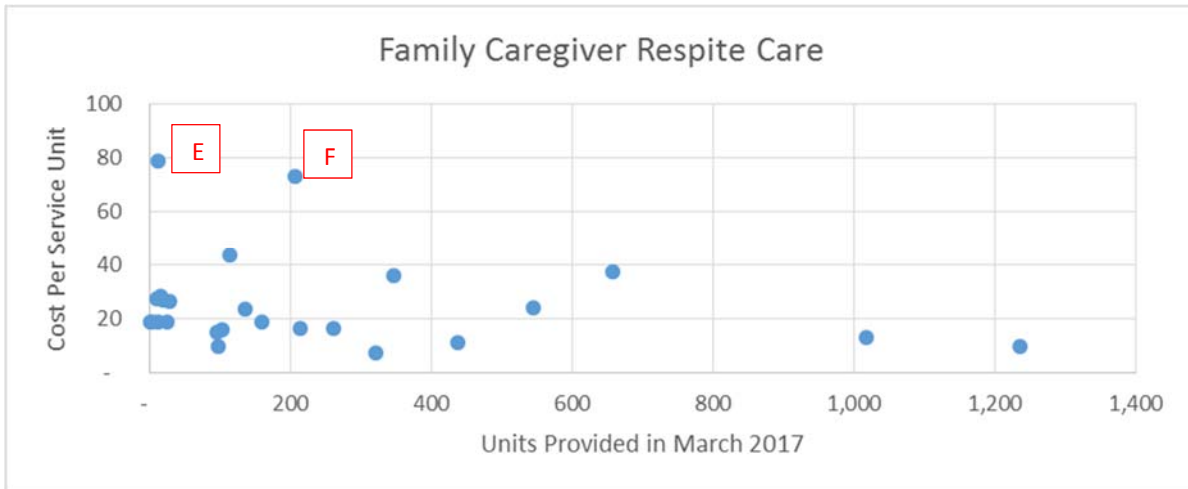
Appendix B – Costs per Unit by Region March 2017



Appendix B – Costs per Unit by Region March 2017



Appendix C – Cost Per Unit Compared to Units Provided – March 2017



Appendix C – Cost Per Unit Compared to Units Provided – March 2017

Graph Tick Marks:

AAA Name	Provider Name	March 2017 Units Provided	Cost Per Unit
A: Pikes Peak Area Council of Governments AAA	Park County Senior Coalition	56	\$ 49.92
B: Association of Governments of Northwest Colorado	Routt County	48	\$ 131.28
C: Pikes Peak Area Council of Governments AAA	Park County Senior Coalition	-	\$ 89.55
D: Association of Governments of Northwest Colorado	Garfield County Department of Human Services	30	\$ 136.63
E: Association of Governments of Northwest Colorado	Garfield County Department of Human Services	12	\$ 79.08
F: Association of Governments of Northwest Colorado	Senior Daybreak of Hilltop	207	\$ 73.07
G: Northwest Colorado Council of Governments	Pitkin County Senior Services	105	\$ 87.78
H: Northwest Colorado Council of Governments	Pitkin County Senior Services	87	\$ 50.65
I: Northwest Colorado Council of Governments	Grand County Senior Nutrition	150	\$ 39.17

See Section D for additional information regarding cost per unit outliers.