

DEPARTMENT OF DEVELOPMENTAL SERVICES'
AUDIT OF
Networx Supported Living Services, Inc. (NSLS)

Service:

Supported

Audit Period: January 1, 2022, through December 31, 2022

Audit Section

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NETWORX SUPPORTED LIVING SERVICES, INC.

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EXECUTIVE SUMMARY

The Department of Developmental Services (DDS) has audited Networkx Supported Living Services, Inc. (NSLS). The audit was performed upon the Supported Living Service (SLS) for the period of January 1, 2022, through December 31, 2022.

The audit disclosed the following issue of non-compliance:

Finding 1: Supported Living Service – Unsupported Billings

The review of NSLS's SLS program, Vendor Number HQ0667, revealed that NSLS had a total of \$1,809 of unsupported billings to San Diego Regional Center (SDRC).

The total of the finding identified in this audit amounts to \$1,809, which is due back to DDS. A detailed discussion of this finding is contained in the Finding and Recommendation section of this report.

BACKGROUND

DDS is responsible, under the Lanterman Developmental Disabilities Services Act, for ensuring that persons with developmental disabilities receive the services and supports they need to lead more independent, productive and normal lives. DDS contracts with 21 private, nonprofit regional centers that provide fixed points of contact in the community for serving eligible individuals with developmental disabilities and their families in California. In order for regional centers to fulfill their objectives, they secure services and supports from qualified service providers and/or contractors. Pursuant to the Welfare and Institutions (W&I) Code, Section 4648.1, DDS has the authority to audit those service providers and/or contractors that provide services and supports to persons with developmental disabilities.

OBJECTIVE, SCOPE AND METHODOLOGY

Objective

The audit was conducted to determine whether NSLS's program was compliant with the W&I Code, California Code of Regulations (CCR), Title 17, State and Federal laws and regulations and the regional centers' contracts with NSLS for the period of January 1, 2022, through December 31, 2022.

Scope

The audit was conducted in accordance with the Generally Accepted Government Auditing Standards (GAGAS) issued by the Comptroller General of the United States. The auditors did not review the financial statements of NSLS, nor was this audit intended to express an opinion on the financial statements. The auditors limited the review of NSLS's internal controls to gain an understanding of the transaction flow and invoice preparation process, as necessary, to develop appropriate auditing procedures. The audit scope was limited to planning and performing audit procedures necessary to obtain reasonable assurance that NSLS complied with W&I Code and CCR, Title 17. Any complaints that DDS' Audit Section was aware of regarding non-compliance with laws and regulations were also reviewed and addressed during the course of the audit.

The audit scope was determined by reviewing the service provided to SDRC that utilized NSLS's services during the audit period. NSLS provided one type of service, which DDS audited. By analyzing the information received from the vendor, an internal control questionnaire and a risk analysis, it was determined that a two-month sample period would be sufficient to fulfill the audit objectives.

SUPPORTED LIVING SERVICE

During the audit period, NSLS operated one SLS program. The audit included the review of one of NSLS's SLS program, Vendor Numbers HQ0667, SC 896 and testing was done for the sampled months of July 2022 and August 2022.

Methodology

The following methodology was used by DDS to ensure the audit objectives were met. The methodology was designed to obtain a reasonable assurance that the evidence provided was sufficient and appropriate to support the finding and conclusion in relation to the audit objectives. The procedures performed included, but were not limited to, the following:

- Reviewed vendor files for contracts, rate letters, program designs, POS authorizations and correspondence pertinent to the review.
- Communicated with regional center staff for vendor background information and to obtain insight into the vendor's operations.
- Interviewed vendor management to gain an understanding of the vendor's accounting procedures and processes for regional center billing.
- Obtained and reviewed the vendor's internal control questionnaire.
- Reviewed vendor service/attendance records to determine if the vendor had sufficient and appropriate evidence to support the direct care services billed to the regional center.
- Analyzed the vendor's payroll and service records to determine if the appropriate level of staffing was provided.
- Interviewed the vendor's Executive Director and Directors, for vendor background information and to gain understanding of accounting procedures and financial reporting process.

CONCLUSION

Based upon items identified in the Finding and Recommendation section, NSLS had a finding of non-compliance with the requirements of CCR, Title 17.

VIEWS OF RESPONSIBLE OFFICIALS

DDS issued a draft audit report on Monday, September 18, 2023. The finding in the report was discussed at an exit videoconference with NSLS on Friday, September 22, 2023. Subsequent to the exit conference on Friday, September 22, 2023, NSLS did agree with the finding via e-mail.

RESTRICTED USE

This report is solely for the information and use of DDS, Department of Health Care Services, SDRC and NSLS. This restriction is not intended to limit distribution of this report, which is a matter of public record.

FINDING AND RECOMMENDATION

Finding 1: Supported Living Service – Unsupported Billings

The review of NSLS's SLS program, Vendor Number HQ0667, for the sampled month of August 2022, revealed that NSLS had unsupported billings for services billed to SDRC. Unsupported billings occurred due to a lack of appropriate documentation to support the units of service billed to SDRC and non-compliance with the CCR, Title 17.

DDS reviewed the direct care service hours documented on the Employee Timesheets and Consumer Schedule of Services and compared those hours to the direct care service hours billed to the SDRC. DDS noted that the direct care service hours on the Timesheets and Consumer Schedule of Services were 59 hours less than the direct care service hours billed to the SDRC. NSLS was not able to provide appropriate supporting documentation for 59 hours of services billed. The lack of documentation resulted in unsupported billings to SDRC in the amount of \$1,809, which is due back to DDS. (See Attachment A)

W&I Code, Section 4648.1(e)(1) states:

- “(e) A regional center or the department may recover from the provider funds paid for services when the department or the regional center determines that either of the following has occurred:
- (1) The services were not provided in accordance with the regional center's contract or authorization with the provider, or with applicable state laws or regulations.”

CCR, Title 17, Section 54326(a)(3) and (10) states:

- “(a) All vendors shall: ...
- (3) Maintain records of services provided to consumers in sufficient detail to verify delivery of the units of service billed: ...
 - (10) Bill only for services which are actually provided to consumers and which have been authorized by the referring regional center.”

CCR, Title 17, Section 50604(d) and (e) states:

- “(d) All service providers shall maintain complete service records to support all billing/invoicing for each regional center consumer in the program....

(e) All service providers' records shall be supported by source documentation."

Recommendation:

NSLS must reimburse to DDS \$1,809 for the unsupported billings. In addition, NSLS should comply with the CCR, Title 17 as stated above to ensure that proper documentation is maintained to support the amounts billed to SDRC.

Vendor's Response:

NSLS stated in the response, dated Friday, September 22, 2023, that NSLS agreed with the finding.

See Attachment B for the full text of NSLS' response to the draft audit report and Attachment C for DDS' evaluation of NSLS' response.

ATTACHMENT A

NETWORKX SUPPORTED LIVING SERVICES, INC.

To request a copy of the attachment for this audit report, please contact the DDS Audit Section at (916) 654-3695.

ATTACHMENT B – VENDOR’S RESPONSE
NETWORKX SUPPORTED LIVING SERVICES, INC.

To request a copy of the vendor’s response to the audit finding, please contact the DDS Audit Section at (916) 654-3695.

ATTACHMENT C – DDS’ EVALUATION OF NSLS’ RESPONSE

DDS evaluated Networkx Supported Living Services (NSLS) written response to the draft audit report, dated Friday, September 22, 2023, and determined that NSLS agreed with the finding.