# Key Points Of Report

## Texas Commission on Alcohol and Drug Abuse
## 1994 Statewide Financial and Compliance Audit

April 1995

### Overall Conclusion

A material weakness exists in the control environment over the Commission's administration of state and federal grants. This material weakness is indicated by the type and number of problems identified in this report, including the following:

- material weakness in administrative controls for the *Prevention and Treatment of Substance Abuse Block Grant* (CFDA 93.959)
- significant misstatement of assets and failure to disclose liability information in a note to the *financial* statements
- ineffective controls over the contracting process, including monitoring, obtaining audits, and audit resolution

Although known weaknesses in the administration of $160 million in state and federal grants were not corrected during fiscal year 1994, the Commission has indicated a commitment to correct the problems.

### Key Findings

- Inadequate contract monitoring of service providers and the lack of a methodology to establish rates for treatment services have resulted in a material weakness in administrative controls over the Commission's federal grants. Questioned costs totaling $3.1 million have been identified as a result of financial audits of two treatment providers.

- The Commission has not established adequate audit resolution procedures for findings identified in their financial field audits, monitoring visits, and independent audit reports. Without an effective audit resolution process, federal funds are not available for their intended use. Also, the Commission may be required to repay the Federal Government for unresolved questioned costs.

- The Commission does not have controls to identify high-risk service providers and continues to fund those with control structure and program deficiencies. This lack of controls, combined with ineffective communication between departments, jeopardizes $160 million in state and federal programs.

- Currently the State Senate Investigative Committee is reviewing alleged fraud and misappropriation of state and federal funds at the Commission and its service providers. As of the date of this report, the results from this investigation were not available.

# Table of Contents

## Related Reports

Related reports on the Commission issued by the State Auditor's Office address the lack of financial monitoring of service providers and the deficiency of controls over developing and setting the rates that are paid to service providers. (See SAO Report Numbers 95-007 and 95-022.) The findings in these reports impact the *Prevention and Treatment of Substance Abuse Block Grant* (CFDA 93.959) and the *Alcohol and Drug and Mental Health Services Block Grant* (CFDA 93.992).

## Material Weakness in the Control Environment

The type and number of problems identified in this report indicate a material weakness in the control environment over the Commission's administration of state and federal grants. The control environment reflects the attitude, awareness, and actions of employees concerning the importance of controls within the organization. A weakness in the control environment increases the risk that material errors (unintentional mistakes), irregularities (intentional improprieties) and noncompliance could occur and go undetected. Also, a control environment weakness can have a detrimental effect on management's decision-making process.

## Internal Control Issues

Internal Control Issue 1:

### Improve Administrative Controls Over Federal Programs

**Material weaknesses were identified in the administrative controls over contract monitoring and rate setting for the *Prevention and Treatment of Substance Abuse Block Grant Program* (CFDA 93.959) and the *Alcohol and Drug Abuse and Mental Health Services Block Grant Program* (CFDA 93.992).** The Commission did not require contractors to have independent financial and compliance audits prior to state fiscal year 1994. Also, the Commission has not developed and maintained a documented rate setting methodology nor does the Commission verify the accuracy of contractor cost reports. As a result, material noncompliance with federal regulations could exist.

Two contractors received acceptable program reviews from the Commission's Program Monitoring Division; however, financial field audits by the Commission's Audit Department resulted in questioned costs totaling $3.1 million. These contractors received approximately four percent of the $159 million of the federal funds expended in a two-year period audited by the Commission.

Federal regulations require the establishment of appropriate administrative controls to ensure that federal funds are expended for intended purposes.

Recommendation: The Commission should improve administrative controls over contract monitoring and rate setting as follows:

- Require annual financial and compliance audits of contractors by independent auditors.

- Develop a formal documented methodology for use in determining, evaluating, and revising rates paid to contractors.

- Establish procedures to ensure that information contained in the cost reports is reasonable and accurate.

Management's Response: *Management concurs with the State Auditor's recommendations.*

*The Commission has already begun rewriting its auditing policies and procedures. In addition, the auditing staff has been increased from FY 1994 levels to oversee grants and contracts. Field surveys and prevention methods have been incorporated into TCADA normal business operations. Also, beginning in FY 1994, all contractors were required to have an audit performed by an independent CPA.*

*The Commission is also reviewing options to develop procedures and processes for documenting a methodology for rate setting and for ensuring the reasonableness and accuracy of information contained in cost reports. After the conclusion of current discussions with the internal auditors, and other state agencies, the Commission will establish a new procedure and process for rate methodology and review of cost reports. Procedures will be in place and implemented by September 1, 1995.*

*Funding and Program Management Division and the Administrative Services Division is responsible for ensuring that corrective actions are taken. Management believes that these corrective actions will limit any possible material noncompliance with federal regulations.*

Internal Control Issue 2:

## Establish Controls To Identify And Take Action On High-Risk Service Providers

**The Commission does not have controls to identify high-risk service providers and continues to employ the services of those with control structure and program deficiencies.** Additionally, the Commission lacks an effective means to secure corrective action from service providers due to ineffective communication between departments. The lack of controls and coordination between the departments jeopardizes the performance of the Commission's programs, which are funded by the Federal Government and the State. Service providers were awarded $150.1 million in federal and state funds during fiscal year 1994.

In 1993, a service provider was funded more than $200,000 despite repeated and uncorrected deficiencies identified during Commission monitoring visits and single audit reports for 1990 and 1991. Several of the Commission's departments were aware that the service provider had significant problems. These problems included a continual lack of internal controls and corrective actions on reported deficiencies and program eligibility violations.

The same service provider currently owes more than $9,000 of unallowable costs from fiscal year 1991. These unallowable costs are from a grant that includes funding from both the *Prevention and Treatment of Substance Abuse Block Grant* (CFDA 93.959) and General Revenue Funds.

*Statement of Position 92-7, Audits of State and Local Governmental Entities Receiving Federal Financial Assistance* requires the Commission to determine whether service providers spend federal financial assistance funds in accordance with applicable laws and regulations. The Commission must also ensure that service providers receiving federal funds meet all eligibility and audit requirements.

Recommendation: The Commission should establish controls to identify and take action on high-risk service providers. The procedures to be developed should determine the overall status of a service provider. This can be accomplished by combining the results and the status of corrective action for Commission monitoring visits and independent auditor reports. In addition, the procedures should provide for effective communication and coordination between departments. Furthermore, the Commission should ensure that unallowed costs are recovered before providing additional funds to a service provider.

*Management's Response: Management concurs with the State Auditor's recommendations.*

*Controls are currently being developed that will identify and take actions on high-risk service providers. The Commission agrees that in the past interdepartmental communication has been lacking. To correct this deficiency, a comprehensive report be issued annually for each service provider. This report will include functional reports from the Facility Licensure Department, Investigations Department, and Auditing Department, both field audit reports and desk audit reports, and reports from TCADA functions that are responsible for developing and supporting new programs.*

*Individual functions reports will be issued as work is performed. Copies of these reports will be placed in the unique service provider file and monitored. The findings on all reports will be followed-up and resolved.*

*The Program Compliance Division is taking over the program audit function and integrating it with licensure and investigations. The goal is to develop cross-functional work teams to monitor and inspect all licensed or funded programs, eliminating the need to merge information from separate departments. New program audit procedures emphasize outcome instead of process indicators, which will allow the agency to use past performance as a key factor in future funding decisions.*

*The monitoring of the unique service provider file will include all reports to TCADA being filed timely, identifying any unresolved programmatic and/or financial issues, and a periodic summary of the financial and programmatic operations of the service provider. This process will allow TCADA to identify and take corrective action on high-risk service providers.*

*All required action will be in place by August 31, 1995.*

*The Program Compliance Division will have lead responsibility, assisted by the Administrative Services Division, for ensuring that corrective action is taken.*

Internal Control Issue 3:

## Establish Audit Resolution Procedures

**The Commission has not established adequate audit resolution procedures for findings identified in their financial field audits.** The following are examples of deficiencies identified:

- Refunds to federal grants have not been identified and appropriately returned. Also, a methodology to allocate questioned costs to the appropriate funding source has not been developed.

- A refund of all known questioned costs for one audit was not requested. Negotiations reduced $2 million in known questioned costs to $1 million without considering federal liability or state laws.

- The Commission waited 34 days before notifying a contractor of noncompliance with the Agreed Administrative Order and requesting corrective action.

- An audit follow-up of a contractor has not been completed although it has been ten months since the Commission issued its findings.

Without an effective audit resolution process, federal funds are not available for their intended use. Also, the Commission may be required to repay the Federal Government for unresolved questioned costs.

Federal regulations require the Commission to establish audit resolution procedures and return known unallowed costs to the federal grantor. Although a resolution period has not been defined for contractors, federal regulations have established a six-month period as a reasonable period for resolution of subrecipient audit findings.

<u>Recommendation</u>: The Commission should establish effective audit resolution procedures. These procedures should ensure that all unallowed federal costs are identified by funding source and immediately returned to the federal grantor without negotiation of the known questioned costs. The Commission should immediately notify and request corrective action from contractors when they are not in compliance with the Agreed Administrative Orders. Additionally, the Commission should ensure resolution of contractor audit findings within a reasonable time frame, such as six months.

*<u>Management's Response</u>: Management concurs with the State Auditor's recommendations.*

*A revised policy is being staffed to redesign the appeals process. The State Office of Administrative Hearings will replace the Audit Review Board in order to ensure resolution of contractor audit findings within a reasonable period. This redesigned process is expected to be completed no later than March 31, 1995, to be presented to the Board by General Counsel on April 10, 1995.*

*Because of the new management structure, the Assistant Deputy Director for Program Compliance felt it prudent to study the audit related issues and Agreed Order with Austin Rehabilitation Center to ensure appropriateness, which resulted in a necessary delay of implementation. As of this date, Austin Rehabilitation Center is functioning in compliance with the Agreed Order. With the new cease and desist function and added staff in the Program Compliance Office, there will be two points of oversight. Austin Rehabilitation Center will have a follow-up done as part of TCADA's ongoing provider monitoring process.*

*The Administrative Services Division has lead responsibility, with assistance from the Program Compliance Division, for ensuring corrective action is taken.*

Internal Control Issue 4:

## Improve Supporting Documentation

**Adequate documentation of compliance with specific federal program requirements and other federal regulations was not readily available at the Commission.** Documentation supporting percentages used to calculate the amounts expended on categories of services required by the grants, calculations related to cash management, and information on subrecipients of Block Grant funds was either not readily available or had to be recreated. Documentation was not available to accurately determine the portion of the *Prevention and Treatment of Substance Abuse Block Grant* (CFDA 93.959) set aside to provide HIV services.

The lack of current documentation could result in errors and questioned costs that must be returned to the grantor.

Generally, federal guidelines require at least three years of documentation to be maintained. Additionally, adequate documentation provides the Commission with the information necessary to ensure that expenditures are appropriate.

Recommendation: We recommend that the Commission develop procedures that ensure adequate supporting documentation is maintained to comply with federal regulations.

*Management's Response: Management concurs with the State Auditor's recommendations.*

*The percentages of clients diagnosed as either drug or alcohol abusers were supplied by the Research Department. Documentation to support data from the Research Department was taken from CODAP (Client Oriented Data Acquisition Process).*

*The agency concurs that supporting documentation was not readily available. Each record in CODAP can be verified by the source documentation used for data entry. Procedures for retrieving, preparing, maintaining and presenting coherent supporting documentation for support of all calculations are in the process of begin developed.*

*In Fiscal Year 1992 and Fiscal Year 1993, procedures were not developed, and in place, to adequately document methodology for determining Female Service calculations. The agency concurs that supporting documentation was inadequate. A documentation* *methodology has been developed for Female Services for Fiscal Year 1995 and source documentation is currently being maintained.*

*Documentation procedures were inadequate to support the HIV set-aside calculations. Limited documentation was available and provided. Previous methods of HIV Early Intervention funding have been addressed and changed for Fiscal year 1995. The new funding changes will more accurately define and identify HIV Services. These new changes are being properly documented and maintained.*

*The identification of Block Grant subrecipients will be maintained by the Director of Budget and Management Services. All sub-recipients will be entered into the Uniform Statewide Accounting System for better tracking of contractor expenditures.*

*Documentation concerning cash management is addressed in the cash management finding.*

*In summary, procedures for retrieving, preparing, maintaining and presenting coherent supporting documentation for support of all calculations will be developed by an independent contractor and supported by in-house staff. These procedures will be in place by August 31, 1995.*

*The Budget and Management Services Department is responsible for ensuring corrective action is taken.*

## Federal Compliance Issues

The Commission's most significant federal program is the *Prevention and Treatment of Substance Abuse Block Grant* (CFDA 93.959). The Block Grant was revised for federal fiscal year 1993 and thereafter. The former name was *Alcohol and Drug Abuse and Mental Health Services Block Grant* (CFDA 93.992). Expenditures under both grants were incurred during fiscal year 1994.

We tested 20 of approximately 6,199 payments made during fiscal year 1994. The selected payments accounted for $571,000 of the $72.9 million in block grant expenditures.

Recommendations addressed in other sections of this report will impact controls over the Commission's federal programs. The following comments address federal compliance issues developed as a result of audit procedures completed.

Federal Compliance Issue 1:

### Fully Comply With Independent Peer Review Requirements

**The Commission did not perform independent peer reviews of funded treatment programs as required by the federal fiscal year 1993 *Prevention and Treatment Substance Abuse Block Grant* (CFDA 93.959).** Funded programs were not reviewed to assess the efficacy, quality, and appropriateness of treatment services provided to alcohol and substance abusers in Texas.

The Commission is required to have an independent review of at least five percent of the entities that it funds to provide treatment services. The entities reviewed must be representative of all the entities that the Commission utilizes to provide treatment services. Noncompliance may result in the loss of federal funds.

Recommendation: We recommend that the Commission develop and implement a process to perform independent peer reviews of funded entities that provide treatment services during the grant award period. The process that is developed should enable the Commission to assess the efficacy, quality, and appropriateness of treatment services provided to Texans.

*Management's Response: Management concurs with the State Auditor's recommendations.*

*The Commission maintains that the peer review of applications provides valuable information towards identifying the efficacy, quality and appropriateness of treatment services provided to clients. However, the Commission has obtained a copy of the peer review model developed by the Commonwealth of Massachusetts. That process is based on continuous quality improvement and focuses on quality, inclusiveness, customer ownership and is data and outcome driven. The Commission has decided to use the Massachusetts model to be implemented at a more appropriate level which will meet Texas' needs, today. During this fiscal year (FY 1995), the Commission will recruit peer reviewers from Texas' provider base, develop a plan which includes training of peer reviewers, identify which programs will be reviewed and conduct peer review visits. The visits will focus on utilization management. The peer review process will include a review of client assessments, treatment plans, referral systems in place and client interviews to adequately verify client outcomes. Commission staff will play a role in the visits and utilize the data obtained to enhance or change or system.*

*Texas is in the process of embarking on a managed care plan for substance abuse services (formerly known as C.O.R.E.) and this baseline review will provide the state with valuable information for methods of utilization management to pursue and to continue constructing a more effective treatment system for the future.*

*The process of recruiting peer reviewers, planning and training began March 1, 1995. The Commission plans to have peer reviewers in the field by June 1, 1995. At least 5% of the programs funded with SAPT Block Grant funds will be visited by August 31, 1995 in accordance with the requirement.*

*During subsequent years, the Commission will compare and combine utilization management information obtained through the peer review process with utilization management information obtained by TCADA to assess efficacy, quality, and appropriateness of treatment services provided to Texans.*

*Funding and Program Management Division has lead responsibility, with assistance from Quality and Technical Services Division, for implementing the peer review process.*

Federal Compliance Issue 2:

## Identify All Subrecipients Who Should Submit Audit Reports

**The current system at the Commission may not properly identify all subrecipients who should be submitting audit reports.** Discrepancies exist in subrecipient expenditures recorded within the Commission. As a result, subrecipients may not be properly identified.

*Office of Management and Budget (OMB) Circular A-128* requires the Commission to review the audit reports for all subrecipients that receive at least $25,000 in federal funds in a fiscal year. Noncompliance could cause the loss of federal funds.

Recommendation: The Commission should develop a more accurate process to identify all subrecipients that receive federal grants greater than $25,000 in a fiscal year. This listing should be utilized to ensure that audit reports are received from all of the applicable subrecipients.

*Management's Response: Management concurs with the State Auditor's recommendation.*

*TCADA is in the process of developing an integrated computerized system to meet the needs of the agency. The purpose of the system would be to provide standardized information throughout the various departments on a need-to-know basis. To ensure reliability, the system would be reconciled to the USAS on a monthly basis. The new system would have the ability to provide ad hoc reports and standardized reports on demand. One standardized report will identify all of the subrecipients who should submit an audit report and the date the audit report should be submitted. This system will be in place by September 1, 1995.*

*The Budget and Management Services Department has lead responsibility, assisted by the Administrative Services Division, for ensuring that corrective action is taken.*

Federal Compliance Issue 3:

## Ensure Corrective Action of Subrecipient Audit Findings Within the Required Time Frame

(Prior Audit Issue)

**The Commission does not ensure that all subrecipient audit reports are reviewed and that necessary corrective action is taken within six months after receipt.** Three of the 18 audit reports tested for the *Prevention and Treatment of Substance Abuse Block Grant* (CFDA 93.959) contained findings. Corrective actions for these audit reports were not obtained as required.

Noncompliance with this requirement could result in questioned costs and the return of funds to the grantor.

*Office of Management and Budget (OMB) Circular A-128* requires that the Commission review the audit reports for adequacy and determine whether subrecipients take corrective action within six months of report receipt.

Recommendation: The Commission should review all subrecipient audit reports and ensure that corrective action is taken on all subrecipient audit findings within six months.

*Management's Response: Management concurs with the State Auditor's recommendations.*

*An audit follow-up policy and procedures regulation is being drafted and weekly management reports are being implemented to monitor corrective action from audit findings. The policy will be put in place by May 31, 1995.*

*The Administrative Services Division is responsible for ensuring corrective action is taken.*

Federal Compliance Issue 4:

## Revise Cash Management Procedures

**The Commission does not have adequate cash management procedures in place for the *Prevention and Treatment of Substance Abuse Block Grant Program* (CFDA 93.959).** The Commission does not monitor the overall cash needs for the block grant. As a result, insufficient federal funds were requested, which caused negative daily cash balances up to $1.2 million. Other Commission funds were used to cover expenditures for the block grant.

The Commission had negative cash balances for 15 of 22 state working days tested. The remaining seven days had positive cash balances due to the Commission requesting funds to cover the payroll as required by state law. *Title 31 of the Code of Federal Regulations (CFR), part 205.7(d)* states that the Commission will limit the request for federal funds to the minimum amount required to meet actual, immediate cash needs.

Recommendation: The Commission should revise its cash management procedures. Federal funds requests should be determined using cash balances for the federal program and current cash disbursements. This will help ensure that sufficient funds are requested for immediate cash needs.

Additionally, we recommend the Commission temporarily borrow General Revenue Funds to cover payroll costs (*Texas Government Code, section 403.092 (2)*). The Commission should make arrangements with the Comptroller of Public Accounts to initiate this transaction.

*Management's Response: Management concurs with the State Auditor's recommendations.*

*This process has begun. Overall cash needs are monitored on a daily basis by the cash manager. Funds requested for each federal award are determined by immediate cash disbursement needs for the award program, while at the same time taking into account any refunds returned to the Commission. This ensures that the amount of federal funds requested is minimized to meet actual cash needs. A report is prepared daily to support draws for all vouchers processed through the Grants and Contracts system. In addition,* *all documents affecting cash (revenues, operating expenditures, refunds, expenditure transfers) flow through the cash manager so that cash balances and available award balances can be accurately maintained and monitored. Documentation on all draws and source documents supporting the draws are maintained in the cash management office and are readily available for inspection (see Audit Comment #5).*

*The commission concurs with the recommendation to temporarily borrow general revenue funds to cover payroll costs and thus avoid a cash-on-hand issue. Procedures have been implemented for the February 1995 pay period, and federal funds will be drawn prior to the first of each month to repay the general revenue fund on payday.*

*Corrective action has been taken as of March 9, 1995. The Administrative Services Division was responsible for ensuring that corrective action was taken.*

## Accounting And Reporting Issue

Accounting and Reporting Issue 1:

### Comply With The Financial Reporting Requirements

**The Commission's annual financial report is not accurate and complete.** A receivable from a service provider totaling $1,087,895 was not included in the Commission's 1994 Annual Financial Report. Also, the amount of federal questioned costs and amounts due to the State that resulted from this financial field audit were not determined, recorded as a liability on the financial statements, or disclosed in the Notes to the Financial Statements.

The unaudited financial report of the Commission was not issued in accordance with the State Comptroller's annual financial reporting requirements. Errors in reporting may cause users of the financial information to make decisions based on inaccurate data.

The Commission is required to prepare its annual financial report in conformity with the guidelines established by the Comptroller's Office.

Recommendation: The Commission should amend its 1994 Annual Financial Report to comply with the State Comptroller's reporting requirements.

*Management's Response: Management concurs with the State Auditor's recommendations.*

*Although the agreed order with Austin Rehabilitation Center (ARC) to repay questioned costs sets up the potential for an accounts receivable, sufficient doubt exists that the receivable will be collected in full. Generally accepted accounting principles call for a conservative approach to accruing receivable because of the potential of misleading financial statements caused by inflating revenues or, in this case, deflating expenditures. Consequently, any receivable should be offset with an allowance for uncollectible accounts receivable, a contra-asset valuation account showing the portion of accounts receivable not expected to be collected, in an amount sufficient to ensure that only the collectible portion remains as an accrual.*

*Since the financial condition of ARC and the existing real estate market creates doubt that any of the receivable will be paid, the conservative approach would be to offset the entire amount of the accounts receivable with an allowance for uncollectible accounts receivable, leaving a net accounts receivable balance of zero. Although this presentation is preferable to omission of both the accounts receivable and allowances for uncollectible accounts receivable, either presentation fairly represents the amount the agency is actually expected to realize. Users of the financial information would have been mislead if the net receivable had been overstated, and the difference in presentation does not mean the data is inaccurate.*

*A contingent liability, requiring only a note disclosure, would have been made if there appeared to be a future potential for liability in existence as of the balance sheet date. An actual accrual in the financial statements would have been made if, at the time of presentation, a liability existed as of the balance sheet date.*

*From the information available and all analysis conducted up to the date the Annual Financial Report was submitted on November 29, 1994, the agency's position was that the money due back to TCADA from ARC was funded by General Revenue and thus no potential liability to the federal government existed, either as a liability or a contingent liability. Based on all information available on the submission date, the presentation was correct in accordance with generally accepted accounting principles and the Comptroller's reporting requirements.*

*Only after the AFR was submitted did discussions result in a more in-depth analysis of the agreement of ARC and the funds involved, revealing at that point the possibility that some amount would be due back to the federal government. The Commission intends to amend its 1994 AFR is it determines a material understatement of its liabilities has been made as a result of refunds due the federal government from the audit of the Austin Rehabilitation Center. This determination, which will involve both the Auditing Department and the Grants and Contracts Department, should be completed by the end of March. If an amendment is necessary to restate the liabilities, the Commission will also amend the presentation of the asset side of the balance sheet, disclosing an accounts receivable offset with an approximately valued allowances for uncollectible accounts receivable. The amended report, which will be prepared by the Fiscal Services Department, should be completed by April 30, 1995.*

*The Commission will also set up procedures by March 31, 1995 to ensure that the Fiscal Services Department, the department responsible for the preparation of the AFR, is notified of final audit findings so that accounts receivable and/or payable may be set up on the agency's books of record at the point of determination. That will allow for ongoing tracking of accounts receivable, payout agreements, and remaining balances so these items can be reported on accurately at any time. Separate procedures will be implemented for returning refunds of federal monies to the federal government.*

*The Administrative Services Division is responsible for ensuring corrective action is taken.*

## Audit Scope

The primary focus of our audit was the Commission's financial and administrative controls over prevention and treatment programs for alcohol and substance abuse in the State. We gained an understanding of the internal control structure, including the general control environment, as well as controls over the federal programs.

Specific procedures were used to test compliance with the major federal program, *Substance Abuse Prevention Treatment Block Grant* (CFDA 93.959) and *Alcohol and Drug Abuse and Mental Health Services Block Grant* (CFDA 93.992) for federal fiscal years 1993 and 1992, respectively. The Commission incurred expenditures and disbursements for the two block grants totaling $72.4 million during fiscal year 1994.

Per Marshall McDade, this is not to be included in final copy.

Appendix:

# Schedule Of Questioned Costs

| | **Amount Questioned** | **Type of Error** |
|---|---|---|
| Financial Field Audit of Corpus Christi Drug Abuse Council, Inc., by the Commission's Audit Department. Audit resolution and negotiation are scheduled for February 1995. | $2,043,245.00 | Unallowed Expenditures |
| Financial Field Audit of Austin Rehabilitation Center by the Commission's Audit Department. The Commission originally questioned $2 million; however, negotiations have reduced the amount to $1 million. | $1,087,895.00 | Unallowed Expenditures |
| **TOTAL** | $3,131,140.00 | |