November 30, 2012

Mr. Wes Littrell
Middle TN eHealth Connect
500 Interstate Blvd. South
Nashville, TN 37210

Dear Mr. Littrell:

Please find attached the Monitoring Report of the Middle TN eHealth Connect relating to the contract it had with the Metropolitan Government of Nashville and Davidson County for the fiscal year ending June 30, 2012.

The Office of Financial Accountability is charged with the responsibility of monitoring grant funds, including Direct Appropriations, from Metropolitan Nashville Government to any nonprofit organization. Staff from the Office of Financial Accountability conducted the review on October 1, 2012.

We appreciate the assistance provided by your agency during the course of the review. If you have any questions, please call me at 615-880-1035.

Sincerely,

Fred Adom, CPA
Director

cc: Janet King, Executive Director
    Richard M. Riebeling, Director of Finance
    Keith Durbin, Director, Information Technology Services
    Talia Lomax-O’dneal, Deputy Director of Finance
Gene Nolan, Deputy Director of Finance
Kim McDoniel, Chief of Accounts
Mark Swann, Internal Audit
Kevin Brown, Office of Financial Accountability
Essie Robertson, Office of Financial Accountability
Brad Thompson, Office of Financial Accountability
MIDDLE TN eHEALTH CONNECT

♦ Monitoring Report ♦

Conducted by

Office of Financial Accountability

November 30, 2012
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The Office of Financial Accountability (hereinafter referred to as “OFA”) has completed a monitoring review of Middle TN eHealth Connect. A monitoring review is substantially less in scope than an audit. The OFA did not audit the financial statements and, accordingly, does not express an opinion or any assurances regarding the financial statements of the Middle TN eHealth Connect or any of its component units. The OFA is responsible for the internal monitoring of Metropolitan Government of Nashville and Davidson County (hereinafter referred to as “Metro”) agencies that receive federal and state financial assistance, including cooperative agreements and non-profit organizations that receive appropriations and Community Enhancement Funds from Metro government. In summary, any agreement(s) that imposes performance and/or financial requirements on Metro government is subject to review by the OFA.

The purpose of this review was to assess the agency’s compliance with contractual requirements set forth in the following contract with Metro Government:

<table>
<thead>
<tr>
<th>Contract</th>
<th>Type</th>
<th>Amount</th>
<th>Contact Term</th>
</tr>
</thead>
<tbody>
<tr>
<td>L-2724</td>
<td>Direct Appropriations</td>
<td>$250,000</td>
<td>July 1, 2011</td>
</tr>
</tbody>
</table>

**Agency Background**

In 2007, the four CEOs of the Metro Nashville hospitals began discussions on how they might collaborate with each other to improve health care delivery in Davidson County and Middle Tennessee. They, like their colleagues in Memphis and the Tri-Cities area in East Tennessee, wanted to address the problems of access for many residents, overuse by some, and the rising cost of care delivery for all. Their vision is to create a vehicle for the comprehensive exchange of health information among community healthcare providers for the purpose of improving the value of services delivered and the health status of the general public. As a result, in 2009, the Middle Tennessee eHealth Connect was incorporated as a non-profit organization in the state of Tennessee. Board Members continued meeting to discuss the cost of care to the area hospitals and how the MTeHC might impact not only the costs but how it could be the basis for coordination of care. The mission of the Middle Tennessee eHealth Connect is to improve the effectiveness and
efficiency of healthcare delivered to every member of the community without regard to payer by connecting healthcare providers throughout Middle Tennessee.

The objectives of our review were:

1) To determine whether the agency had the resources and capacity to administer the grant funds.
2) To determine if costs and services were allowable and eligible.
3) To verify that program objectives were met.
4) To test the reliability of the financial and programmatic reporting.
5) To verify contractual compliance.

The scope of our review was limited to the contract term July 1, 2011 through June 30, 2012.

Review procedures included meeting with agency management and staff, reviewing the design of internal controls as a basis for establishing our testwork, reviewing board minutes and obtaining written representations from management. In addition, we examined certain financial records and supporting documentation necessary to ensure compliance with contractual requirements set forth in contract L-2724. Specific procedures included:

- Interviewing the employees responsible for grant management, financial reporting, and accountability.
- Reviewing supporting documentation of expenditures for allowability, necessity and reasonableness.
- Reviewing the agency’s general ledger and verifying the accuracy of all invoices submitted to Metro.
- Reviewing documentation to determine that funds were used for intended beneficiaries and expended in accordance with the spending plan of the contract.
- Reviewing documentation to support program activities for consistency with grant requirements.
- Assessing the financial stability of the agency and its ability to continue to administer the grant program funded by Metro.
## SUMMARY OF RESULTS

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sufficient Resources and Capacity to Administer Funds?</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Costs and Services are Allowable and Eligible?</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Program Objectives being Met?</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Reporting Requirements Met?</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Sufficient Internal Control Environment?</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Compliance with Civil Rights Requirements?</td>
<td>✓</td>
<td></td>
</tr>
</tbody>
</table>
The overall results of the monitoring review are provided in this section. Results are based on testwork performed and include conclusions regarding specific review objectives and, if applicable, recommendations for improvement and an action plan for implementation. Where applicable, the Findings and Recommendations section of this report provides more insight into any issues identified below.

1. Sufficient Resources and Capacity to Administer Grant Funds

Our review of the agency’s accounting system and the qualifications of the individuals assigned to manage the accounting records indicate that the agency possesses the necessary resources and professional expertise to effectively administer the grant funds.

2. Allowable and Eligible Costs and Services

Our review covered all of the core compliance areas identified by OMB Circular A-133: *Audit of States, Local Government, and Non-Profit Organizations*. Costs incurred by the agency complied with applicable guidelines stated in OMB Circular A-122.

Additionally, the Metro Grants Manual requires separate accounting of the Metropolitan Nashville Government grant funds to prevent co-mingling of Metro Funds with other sources of funding. The agency was in compliance with this requirement. Different revenue classes as well as expenditure classes have been established to separately track the sources and amounts of funding. Also, the agency can easily and accurately report their expenses supported by the Metro grant.

Based on our test work, costs and services during the period were allowable and eligible.

3. Program and Performance Objectives

The contract stipulates that the agency shall use the funds to help pay the vendor implementation fees associated with the Middle Tennessee eHealth Connect Health Information Exchange (MTeHCHIE). During the contract year, the agency was to:
• Facilitate the transmission and storage of at least 125,000 Nashville-Davidson County patient results records at vendor sites.
• Implement access to MTeHCHIE in the Emergency Departments in Davidson County Hospitals including, Centennial, Summit, Skyline, Southern Hills, Nashville General, Saint Thomas, Baptist, and Vanderbilt University Medical Center (Adult Emergency Department).
• Implement access to MTeHCHIE in two of Davidson County’s Federally Qualified Health Center facilities (United Neighborhood Health Services and University Community Health Services).

Based on our review of program documentation and discussions with staff, program performance objectives were met and the agency was in compliance with contractual program objectives.

4. Reliability of Financial and Programmatic Reporting

The contract requires submission of an annual audit report performed by a Certified Public Accountant. The contract also requires the agency to submit to Metro year end reports of the program outcome and a final expenditures report, no more than 45 days after the close of the contract.

We reviewed all applicable financial and programmatic reports required by the contract, including audited financial statements. Based on our review, the agency complied with all financial and programmatic reporting requirements.

5. Internal Control Environment

In order to determine the adequacy of the design of internal controls, we completed an internal control questionnaire. This audit procedure was performed solely as a basis for determining our test work and to assist us in making suggestions for improvement to management.

Our review of the design of the agency’s internal controls did not reveal any control deficiencies. Further, nothing came to our attention that would necessitate suggestions for improvement in internal control activities to management.
6. Civil Rights Requirements

Our review did not reveal anything to indicate that the agency was noncompliant with civil rights requirements. The agency also has necessary written policies and procedures relating to civil rights. The agency has not received any complaints regarding any form of discrimination. Further, civil rights and ADA postings are publicly displayed.