



OHIO AUDITOR OF STATE
KEITH FABER



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INDEPENDENT ACCOUNTANT'S REPORT ON APPLYING AGREED-UPON PROCEDURES

Ohio Department of Developmental Disabilities
30 East Broad Street
Columbus, Ohio 43215

We have performed the procedures enumerated below on the disbursements and statistical data recorded in the County Board Cost Report System (Cost Report) of the Lorain County Board of Developmental Disabilities (County Board) for the year ended December 31, 2022 and certain compliance requirements related to the Cost Report and Medicaid services, included in the information provided to us by the management of the County Board. The County Board is responsible for the data in the Cost Report for the year ended December 31, 2022 and certain compliance requirements related to the Cost Report and Medicaid services included in the information provided to us by the County Board.

The Ohio Department of Developmental Disabilities (the Department) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of aiding in the evaluation of the County Board's disbursements and statistical data recorded in the Cost Report for the year ended December 31, 2022, and certain compliance requirements related to the Cost Report and Medicaid services. No other party acknowledged the appropriateness of the procedures. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of the report and may not meet the needs of all users of the report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes. The sufficiency of the procedures is solely the responsibility of the Department. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and the associated findings are as follows:

Allocation Statistics - Square Footage

We confirmed through inquiry with the County Board and scanning of the Summary by Service Code report that it did not render any paid Medicaid waiver services for only a portion of calendar year 2022.

Allocation Statistics - Attendance

1. We footed the Day Services - All Locations and SE Case Notes reports for accuracy. There were no computational errors.

We compared the attendance reports to the reported number of individuals served, days of attendance and 15 minute units and to the Cost Report Guide. We identified no variances.

2. We traced the total attendance days for five individuals for each service type for two months from the daily attendance documentation and attendance acuity reports to the Cost Report. There were differences as reported in the Appendix.

For the identified differences, we compared the correct attendance to the Summary by Service Code report. We found no payments for unsupported days.

Allocation Statistics - Transportation

1. We footed the Transportation Trips by Age Group report for accuracy. There were no computational errors.

We compared the total number of adult one-way trips from the transportation report to the Cost Report. There were no variances.

2. We traced the number of trips for 10 adults for one month from the daily service documentation to the compilation of trips. There were no variances.
3. We inspected the cost of bus tokens/cabs on the *Annual Summary of Transportation Services* and found no cost of bus tokens/cabs reported. We inspected the IHAC Expense Detail report for any omitted costs and found none.

Statistics – Service and Support Administration (SSA)

1. We footed the County Board's TCM Allowable, Unallowable and Other report for accuracy. There were no computational errors.

We compared the number of Targeted Case Management (TCM), Other SSA Allowable, and SSA Unallowable units from the SSA report with the Cost Report. We found no variances.

2. We selected 20 Other SSA Allowable recipient dates of service from the SSA reports and compared the documented activity to Ohio Admin. Code 5160-48-01(D) and to the elements required by Ohio Admin. Code 5160-48-01(F). There were no variances.

Paid Claims

1. We scanned the Summary by Service Code report and confirmed that the County Board provided both adult and non-medical transportation (NMT) services and we selected 50 among all waiver service codes for the year. We compared the County Board's service documentation to the applicable rules for the claims selected within Ohio Admin. Code Chapter 5123-9 in effect at the time of service delivery. We found no instances of non-compliance.
2. We selected 50 Targeted Case Management (TCM) recipient dates of service and compared the County Board's documentation to requirements listed in Ohio Admin. Code 5160-48-01(F). We found instances of non-compliance as described below and calculated recoverable findings. We also reported the corresponding unit adjustments in the Appendix.

Service Code	Units	Review Results	Finding
TCM	37	Units billed for direct service	\$503.46
TCM	29	Units billed by two SSAs for same activity at the same time	\$389.69
		Total	\$893.15

3. The County Board's NMT contract specified a per bus per day amount and was not for the complete provision of the service as the County Board was responsible for providing resources, such as fuel. As a result, we were unable to compare a contracted rate to the reimbursed rate. We found no instances of other contracted services in our sample.

Paid Claims (Continued)

4. We confirmed through review of the contract that it had no new or renewed transportation contracts during calendar year 2022.
5. We compared the number of reimbursed TCM units from the Summary by Service Code to the final units reported. We confirmed that total reimbursed units were less than final TCM units.

Non-Payroll Expenditures

1. We traced non-payroll expenditures on the IHAC Expense Detail reports to the amounts reported on the CBCR forms for indirect costs, program supervision, adult transportation services, SSA and adult programs. We found no variances.
2. We selected 60 disbursements from service contracts and other expenses from the IHAC Expense Detail report in cost categories that contributed to Medicaid rates. We compared the County Board's supporting documentation to the Cost Report and 2 CFR 200.420 - .475.

There were variances greater than two percent and non-federal reimbursable costs. For any errors, we scanned the IHAC Expense Detail report for other like errors in the same cost center. We found additional similar errors and totaled all identified errors as reported in the Appendix.

3. We confirmed that the County Board maintained documentation for one month in each quarter in accordance with Ohio Admin. Code 5123-4-01(N)(1).
4. We confirmed that there was an associated cost reported under the appropriate adult program for the final attendance statistics and square footage. We confirmed there are no adult program, professional service costs or square footage without final attendance statistics.

Payroll

1. We compared the salaries and benefit costs on the IHAC Expense Detail report to the amounts reported on the worksheets/forms for indirect costs, program supervision, adult transportation, SSA and adult programs. There were no variances exceeding \$500.
2. We selected 40 employees from the Employee List, including the SSA Director and a Behavioral Analyst from cost categories that contribute to Medicaid rates. For the employees selected, we compared the organizational chart, IHAC Expense Detail report, Case Notes Summary of Units Billed By Case Manager, and job descriptions and basis for allocation to the worksheet in which each employee's salary and benefit costs were allocated in accordance with the Cost Report Guide. There were variances as reported in the Appendix.
3. We confirmed that the misclassification error in procedure 2 was less than 10 percent.
4. We confirmed through inquiry with the County Board that it had no shared personnel costs with other County Boards.

Medicaid Administrative Claiming (MAC)

1. We compared the actual salaries and benefits for the Random Moment Time Study (RMTS) participants for the first quarter from the Check/Direct Deposit Register to the Roll-up report and from the Roll-up report to the salaries and benefits submitted on the Cost by Individual Report. We confirmed that the actual salaries and benefits equaled MAC reimbursed salaries and benefits.

Medicaid Administrative Claiming (Continued)

2. For 10 moments selected by the Department, we obtained copies of the entries in the RMTS web-based program (RMTS Screenshot). We compared the entry in the "Comment" section of the RMTS screenshot and any uploaded supporting documentation to the responses in the "Moment Information" and "Moment Answers" sections. We found no variances.

Unit Rate

For unit rates identified by the Department on the Comprehensive Cost Report Rate sheet, we used the CBCR notes and any Department Desk Review notations and inquired with County Board management regarding omissions or misreporting of costs or statistics, new contracts, and changes due to privatization which impact the unit rates.

The County Board indicated it was not aware of any errors that might impact the identified unit rates.

We were engaged by the Department to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA). We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the County Board's Cost Report and compliance with certain laws and regulations. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the County Board and to meet our ethical responsibilities, in accordance with the ethical requirements established by the AICPA related to our agreed-upon procedures engagement.



Keith Faber
Auditor of State
Columbus, Ohio

July 23, 2024

Appendix
Lorain County Board of Developmental Disabilities
2022 Cost Report Adjustments

	Reported Amount	Correction	Corrected Amount	Explanation of Correction
Attendance Statistics				
Adult Program				
Total Days of Attendance by Acuity				
A, Supported Emp.-Enclave (Non-Title XX Only)	8,593	2	8,595	To match daily attendance support
Annual Summary of Units of Service - Service and Support Administration				
TCM Units, CB Activity	114,260	(37)		To reclassify direct service unallowable units
		(29)	114,194	To reclassify duplicated SSA unallowable units
SSA Unallowable Units, CB Activity	9,033	37		To reclassify direct service unallowable units
		29	9,099	To reclassify duplicated SSA unallowable units
Indirect Cost Allocation				
Service Contracts, Gen Expense All Program	\$ 167,502	\$ (40,000)	\$ 127,502	To reclassify Children and Family First Council Costs
Other Expenses, Non-Federal Reimbursable	\$ 40,322	\$ 3,108		To reclassify advocacy event gifts to non-reimbursable
		\$ 1,264	\$ 44,694	To reclassify promotional items for tech fair to non-reimbursable
Program Supervision				
Other Expenses, Service & Support Admin	\$ 3,232	\$ (1,000)	\$ 2,232	To reclassify sponsorship costs to non-federal reimbursable
Other Expenses, Non-Federal Reimbursable	\$ -	\$ 1,000	\$ 1,000	To reclassify sponsorship costs to non-federal reimbursable
Building Services				
Other Expenses, Service & Support Admin	\$ 12,862	\$ 13,435	\$ 26,297	To reclassify building service costs
Direct Services				
Salaries, Community Residential	\$ -	\$ 1,506	\$ 1,506	To reclassify advocacy and compliance salaries
Service Contracts, Unassigned Children Program	\$ 15,896	\$ 40,000	\$ 55,896	To reclassify Children and Family First Council Costs
Service Contracts, Community Residential	\$ 415,869	\$ 5,000	\$ 420,869	To reclassify self advocacy event to Direct Services
Service Contracts, Family Support Services	\$ 590,901	\$ 4,897	\$ 595,798	To reclassify parent training to FSS
Other Expenses, Community Residential	\$ 62,274	\$ 10,695	\$ 72,969	To reclassify Homemaker Personal Care expense

Appendix
Lorain County Board of Developmental Disabilities
2022 Cost Report Adjustments

	Reported Amount	Correction	Corrected Amount	Explanation of Correction
Services and Support Admin				
Salaries, Service & Support Admin Costs	\$ 2,515,577	\$ (1,506)	\$ 2,514,071	To reclassify advocacy and compliance salaries
Service Contracts, Service & Support Admin Costs	\$ 33,001	\$ (4,897)		To reclassify parent training to FSS
		\$ (5,000)	\$ 23,104	To reclassify self advocacy event to Direct Services
Other Expenses, Service & Support Admin Costs	\$ 144,892	\$ (3,108)		To reclassify advocacy event gifts to non-reimbursable
		\$ (1,264)		To reclassify promotional items for tech fair to non-reimbursable
		\$ (10,695)		To reclassify Homemaker Personal Care expense
		\$ (13,435)	\$ 116,390	To reclassify building service costs
A1 Adult				
Transportation, Less Revenue	\$ -	\$ 2,221	\$ 2,221	To record offset to expense from vehicle insurance claim proceeds

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LORAIN COUNTY BOARD OF DEVELOPMENTAL DISABILITIES

LORAIN COUNTY

AUDITOR OF STATE OF OHIO CERTIFICATION

This is a true and correct copy of the report, which is required to be filed pursuant to Section 117.26, Revised Code, and which is filed in the Office of the Ohio Auditor of State in Columbus, Ohio.



Certified for Release 8/15/2024

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This report is a matter of public record and is available online at
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