



# **BROWN COUNTY BOARD OF DEVELOPMENTAL DISABILITIES**

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### Independent Auditor's Report on Applying Agreed-Upon Procedures

Halina Schroeder, Audit Chief Division of Fiscal Administration, Audit Office Ohio Department of Developmental Disabilities 30 E. Broad Street, 13<sup>th</sup> Floor Columbus, Ohio 43215

Dear Ms. Schroeder:

As permitted by Ohio Rev. Code § 5123.05 and as required by the *Application for a § 1915(c) HCBS Waiver*, Appendix I-2(c), the Auditor of State's Office performed the procedures enumerated below, to which the Ohio Department of Developmental Disabilities (DODD) agreed. The purpose is to assist you in evaluating whether the Brown County Board of Developmental Disabilities (County Board) prepared its *Income and Expenditure Report* for the years ended December 31, 2010 and 2011 (Cost Reports) in accordance with DODD's Guide to Preparing Income and Expenditure Reports for 2010 and 2011 (Cost Report Guides) and to assist you in evaluating whether reported receipts and disbursements complied with 2 CFR 225 (OMB Circular A-87 *Cost Principles for State, Local, and Indian Tribal Governments*), and other compliance requirements described in the procedures below. The County Board's management is responsible for preparing these reports. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of DODD. 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 Auditor of State, under the same authority noted above, also performed the Acuity Testing procedures below for the 2008, 2009, 2010 and 2011 Cost Reports.

#### Statistics – Square Footage

1. DODD requested us to tour the facilities to identify how space was used by County Board programs and to identify new, closed or empty buildings along with rented or idle space and, if final 2009 square footage totals are the same and no significant changes in the floor plan have occurred, to perform no additional procedures.

We toured the facilities to identify how space was used by County Board programs and to identify new, closed or empty buildings along with rented or idle floor space.

We found no unreported or idle floor space.

We also compared 2010 and 2011 square footage totals to final 2009 square footage totals and discussed square footage changes with the County Board and noted one significant change due to Enclave program. Therefore, we performed limited procedures below in those areas where the square footage changed since 2009.

2. DODD requested us to report variances if the County Board's square footage for three rooms varied by more than 10 percent of the square footage reported in the summary which rolls up to Schedule B-1, Section A, Square Footage of the Cost Reports.

We measured three rooms and compared the square footage to the County Board's square footage summary.

We found no square footage variances for rooms that were measured exceeding 10 percent.

3. DODD requested us to report variances if the County Board's square footage for one floor plan varied by more than 10 percent of the square footage reported in the summary which rolls up to Schedule B-1, Section A, Square Footage of the Cost Reports.

We compared each room on the floor plans that changed from the final 2009 square footage to the County Board's summary for each year.

We found no variances exceeding 10 percent when comparing the total square footage of one floor plan to the County Board's summary.

4. DODD requested us to report variances if the County Board's square footage summary varied by more than 10 percent when comparing the County Board's summary to the Cost Report for any cell within *Schedule B-1*, *Section A*, *Square Footage* worksheet.

We compared the County Board's final 2009 square footage summary to the square footage reported for each cell in *Schedule B-1, Section A, Square Footage* of the Cost Reports.

We found variances exceeding 10 percent and we reported these variances in Appendix A (2010) and Appendix B (2011).

5. We obtained the County Board's methodology for allocating square footage between programs and reviewed the methodology to ensure that square footage for areas shared by more than one type of service is allocated by program based on reported usage of the area in accordance with the Cost Report Guides.

We did not perform this procedure as there were no significant changes in square footage allocated between programs from the square footage reported in the final 2009 Cost Report through 2010 and 2011 (see Procedure 1 above).

However, we noted that square footage for the Mac Coordinator and Asst. Coordinator should be allocated to the MAC program and that square footage for Program Supervision should be reallocated due to corresponding changes in employees' salaries (see Payroll Testing, Procedure 3).

### Statistics - Attendance

1. We reviewed the Cost Reports to determine if individuals served or units of service were omitted on *Schedule B-1, Section B, Attendance Statistics*, worksheet 4, or worksheets 7A to 7H which result in unassigned program or general expenses-all program costs.

We determined that there were no individuals served or units of service omitted on *Schedule B-1*, *Section B, Attendance Statistics*, worksheet 4, or worksheets 7A to 7H which resulted in unassigned program or general expenses-all program costs.

2. DODD asked us to compare the County Board's final 2009 typical hours of service reported on *Schedule B-1, Section B, Attendance statistics* to the typical hours of service reported on *Schedule B-1* for 2010 and 2011 and, if the hours are the same, to do no additional procedures.

We compared the final 2009 typical hours of service to the typical hours of service reported on *Schedule B-1* for 2010 and 2011.

We found the reported typical hours of service changed in 2011 and we compared the County Board's supporting documentation for typical hours of service to the typical hours of service reported on *Schedule B-1* for 2011.

We found no differences.

3. DODD requested us to report variances if the Board's attendance statistics were not within two percent of the attendance statistics reported.

We compared the County Board's Attendance By Month All Clients By Age Group Reports for the number of individuals served, days of attendance, with similar information reported for Day Habilitation/Adult Day Services on *Schedule B-1, Section B, Attendance Statistics* of the Cost Reports and determined if the statistics were reported in accordance with the Cost Report Guides. We also footed the County Board's reports on Attendance Statistics for accuracy.

We found variances exceeding two percent as reported in Appendix A (2010) and Appendix B (2011).

4. DODD requested us to report variances if the County Board's number of individuals served varied by more than 10 percent when comparing to the prior audited period's attendance statistics on Schedule B-1, Section B, Attendance Statistics.

We compared the County Board's final 2009 number of individuals served to the final individuals served for Day Habilitation/Adult Day Services for 2010 and the final 2010 individuals served to the final individuals served for 2011 on *Schedule B-1*, *Section B, Attendance Statistics* and determined if the variances were over 10 percent.

The number of reported individuals served did not change by more than 10 percent from the prior year's Schedule B-1.

5. DODD requested us to haphazardly selected 15 individual names from the County Board's Attendance sheets for 2010 and 15 names for 2011, and compare the individuals by name to the compiled listing of individuals served by program documentation which rolls up to *Schedule B-1, Section B, Attendance Statistics* of the Cost Reports and report variances if the individuals served were not within three of the individuals documented on the attendance sheets.

We did not perform this test since the number of reported individuals in Procedure 4 above did not change by more than 10 percent from prior year's Schedule B-1.

6. DODD requested us to report variances to *Schedule B-1, Section B, Attendance Statistics* if more than three of the 15 minute Community Employment units tested were not calculated in accordance with the Cost Report Guides.

We did not perform this procedure because the County Board did not provide Community Employment services.

### **Acuity Testing**

1. DODD requested us to report variances if days of attendance on the Days of Attendance by Acuity supplemental Cost Report worksheets for 2008, 2009, 2010 and 2011 did not agree to the County Board's supporting documentation.

We compared the number of attendance days from the County Board's attendance acuity report for Day Habilitation/Adult Day Services/Vocational Habilitation and Enclave with the Days of Attendance by Acuity supplemental Cost Report worksheets for 2008, 2009, 2010 and 2011.

We found no differences in 2008 and 2011.

For 2009, we found the following acuity variances:

- 7 Adult Day Services attendance days should be added to acuity level A1;
- 106 Adult Day Services attendance days should be removed from acuity level A;
- 258 Adult Day Services attendance days should be added to acuity level B; and
- 147 Adult Day Services attendance days should be removed from acuity level C.

We found the following acuity variances for 2010:

- 40 Adult Day Service attendance days should be removed from acuity level A; and
- 1 Adult Day Service attendance day should be removed from acuity level B.
- 2. We also compared two individuals from each acuity level on the County Board's 2008, 2009, 2010 and 2011 attendance acuity reports to the Acuity Assessment Instrument for each individual for each year.

We found no differences in 2008, 2010 or 2011.

For 2009, we found two Adult Day Services attendance days should be reclassified from acuity level A1 to C. We also found two adult day service individual where the acuity assessment instrument or equivalent document was not provided by the County Board.

We reported the differences from both procedure 1 and 2 on the revised Days of Attendance by Acuity supplemental Cost Report worksheet for 2009, 2010 and 2011 and submitted to DODD.

## Statistics - Transportation

1. DODD requested us to report variances if the County Board's transportation units were not within two percent of total units reported on each line of *Schedule B-3*, *Quarterly Summary of Transportation Statistics*.

We compared the number of one-way trips from the County Board's Print Transportation by Age Group reports with those statistics as reported in *Schedule B-3, Quarterly Summary of Transportation Statistics* of the Cost Reports. We also footed the County Board's Quarterly Transportation report for accuracy.

We found no differences in 2010. We found differences as reported in Appendix B (2011).

2. DODD requested us to report variances of more than 10 percent of the total trips taken for five individuals for both 2010 and 2011, between the County Board's internal documentation versus the amount reported on *Schedule B-3*, *Quarterly Summary of Transportation Services*.

We traced the number of trips for five adult individuals for March 2010 and September for 2011 from the County Board's daily reporting documentation to Schedule B-3, Quarterly Summary of Transportation Services.

We found no differences.

3. DODD requested us to report variances if the County Board's cost of bus tokens/cabs was not within two percent of the total amount reported on *Schedule B-3*, *Quarterly Summary of Transportation Statistics*.

We did not perform this procedure as the County Board did not report the cost of bus tokens or cabs on *Schedule B-3* of the Cost Report for 2010 or 2011. However, we did review the County Board's State Expenses Without Payroll or Benefits Detailed reports for any of these costs not identified by the County Board (see procedures and results in the Non-Payroll Expenditures and Reconciliation to the County Audit Report Section). We found no unreported costs.

### Statistics – Service and Support Administration (SSA)

1. DODD requested us to report variances if the County Board's SSA units were not within two percent of total units reported on each line of *Schedule B-4*, *Quarterly Summary of Units of Service – Service and Support Administration*.

We compared the number of SSA units (Targeted Case Management (TCM), Other SSA Allowable, and SSA Unallowable) from the County Board's 2010 Quarterly TCM Unit Summary and Billable Unit reports and 2011 TCM Allowable/Unallowable Detail reports with those statistics reported in Schedule B-4, Quarterly Summary of Units of Service – Service and Support Administration. We also footed the County Board's Quarterly SSA reports for accuracy.

We found differences exceeding two percent as reported in Appendix A (2010) and Appendix B (2011).

2. DODD requested us to report variances if the Other SSA Allowable units tested had an error rate exceeding 10 percent.

We haphazardly selected a sample of 63 Other SSA Allowable units for 2010 and a sample of 62 Other SSA Allowable units for 2011 from the 2010 Quarterly Unit Entry by Date Span reports and 2011 TCM Allowable/Un-Allowable Detail reports and determined if the case note documentation described activities listed in Ohio Admin. Code § 5101:3-48-01(D), and also included the documentation required by Ohio Admin. Code § 5101:3-48-01(F).

We found no errors.

3. DODD requested us to report variances if the SSA Unallowable units tested had an error rate exceeding 10 percent.

We haphazardly selected a sample of 60 Unallowable SSA service units for 2010 and 121 Unallowable SSA service units for 2011 from the 2010 Quarterly Unit Entry by Date Span and 2011 TCM Allowable/Un-Allowable Detail reports and determined if the case note documentation described activities listed in Ohio Admin. Code § 5101:3-48-01(D), and also included the documentation required by Ohio Admin. Code § 5101:3-48-01(F).

We found no errors.

4. DODD requested us to report decreases exceeding five percent in total SSA units by line on *Schedule B-4* when compared to the prior year's final Cost Report.

We compared the final 2009 SSA units to the final 2010 SSA units and compared the final 2010 SSA units to the final 2011 SSA units.

The final Other SSA Allowable and Unallowable units decreased on *Schedule B-4* by more than five percent from 2010 to 2011 and we obtained the County Board's explanation that the County Board had fewer SSA's to record units as compared to the previous year. We reported no variances in Appendix A (2010) or Appendix B (2011).

5. DODD requested us to determine if the County Board maintained case note documentation for non-individual specific activities (general time units) as described in *Worksheet 9, Service and Support Administration Costs* of the Cost Report Guides. If the County Board did record general time units and they accounted for over 10% of total SSA units on the final audited Schedule B-4 plus any general time units recorded, DODD requested us to determine if they were properly classified and report any variances with an error rate exceeding 10 percent and indicated a systemic issue.

We haphazardly selected a sample of 87 General Time Units for 2010 and 62 General Time Units for 2011 from the Quarterly Detailed Units Marked Non-Billable reports and determined if the case note documentation described activities listed in Ohio Admin. Code § 5101:3-48-01(D) or in Worksheet 9, Service and Support Administration Costs, Section 1(b) of the Cost Report Guides.

We found no errors in 2011. We found errors exceeding 10 percent as reported in Appendix A (2010).

### Revenue Cost Reporting and Reconciliation to the County Auditor Report

1. We compared the receipt totals from the 12/31/2010 and 12/31/2011 County Auditor's Revenue History Report for the (B50) Developmental Disabilities Fund and (S40) Residential Facility Fund to the County Auditor's report totals reported on the *Reconciliation to County Auditor Worksheets*.

We found differences for 2010 as reported in Appendix A. We found no differences in 2011.

2. DODD asked us to determine whether total County Board receipts reported in the *Reconciliation to County Auditor Worksheets* reconciled within 1/4 percent of the County Auditor's yearly report of total receipts for these funds.

Total County Board receipts were within 1/4 percent of the County Auditor yearly receipt totals reported for these funds.

3. We compared the account description and amount for each revenue reconciling item on the *Reconciliation to County Auditor Worksheet* to the County Board's State Account Code Detail Reports and other supporting documentation such as county tax settlement sheets.

We did not perform this procedure since the total County Board receipts were within 1/4 percent of the County Auditor yearly receipt totals in Procedure 2 above.

4. We compared revenue entries on *Schedule C, Income Report* to the Southern Ohio Council of Governments (SOCOG) Summary Workbook for Brown County.

We found no differences in 2010. We found differences in 2011 as reported in Appendix B (2011).

5. We reviewed the County Board's detailed revenue report and *Schedule C, Income Report* to determine whether revenues are maintained separately to offset corresponding expense via the use of specific expenditure costs centers and identified any potential revenue offsets/applicable credits.

We identified the following sources of potential revenue credits for which the County Board did not offset costs on the Cost Reports in accordance with 2 CFR 225, Appendix A, (C)(3)(c) and (4)(a):

- Miscellaneous refunds, reimbursements and other income in the amount of \$3,257 in 2010 and \$2,309 in 2011;
- Refunds from Grow Inc. in the amount of \$1,889 in 2010 and \$2,719 in 2011;
- Energy rebate in the amount of \$2,339 in 2010;
- Insurance claim proceeds in the amount of \$6,941 in 2011;
- Transportation reimbursement in the amount of \$1,147 in 2011; and
- Title XX revenues in the amount of \$22,121 in 2010 and \$30,865 in 2011.

## **Paid Claims Testing**

1. We selected 100 paid claims among all service codes from 2010 and 2011 from the Medicaid Billing System (MBS) data and determined if the claims met the following service documentation requirements of Ohio Admin. Code §§ 5123:2-9-05, 5123-2-9-18(H)(1)-(2), and 5101:3-48-01(F):

- Date of service;
- Place of service;
- Name of the recipient;
- Name of the provider;
- Signature of the person delivering the service or initials of the person delivering the service if the signature and corresponding initials are on file with the provider;
- Type of service (for homemaker/personal care, type must include if routine, on-site/on-call, or level one emergency);
- Number of units of the delivered service or continuous amount of uninterrupted time during which the service was provided; and
- Arrival and departure times of the provider of service's site visit to the recipient's location or of the recipient's visit to the provider of service's location. 1

We found instances of non-compliance with these documentation requirements for 2010 and 2011.

<sup>&</sup>lt;sup>1</sup> For non-medical transportation (service codes) we reviewed similar service documentation requirements to ensure compliance with Ohio Admin. Code § 5123:2-9-18(H)(1)-(2) excluding (H)(1)(d),(f),(j) and (H)(2)(d),(f).

## Recoverable Finding - 2010 Finding \$135.80

We determined the County Board was over reimbursed for four units of Non-Medical Transportation-Per Trip-Eligible Vehicle (ATB) in which the individuals were absent, one unit of ADS & Voc Hab "Combo"-Daily (AXD) and one unit of ADS & Voc Hab "Combo"-Daily (FXD) in which the County Board could not provide service documentation.

Service Code	Units	Review Results	Total Finding
ATB	4	The individuals were absent	\$56.19
AXD	1	No service documentation	\$29.58
FXD	1	No service documentation	\$50.03
		ТОТ	AL \$135.80

## Recoverable Finding - 2011 Finding \$588.60

We determined the County Board was over reimbursed for three units of Non-Medical Transportation-Per Trip-Eligible Vehicle (FTB) in which the individuals were absent in 2011.

We also found two instances of two units of Non-Medical Transportation-Per Trip-Eligible Vehicle (ATB) in which the individuals were absent. We also found two ATB trips in which claims for one DD individual were submitted at four trips per day when only two trips were provided. We reviewed the 2011 MBS system claims data and identified where the County Board billed 40 ATB units (at four trips per day) during the month of March 2011. The County Board responded that four trips a day should not have been billed for the DD individual, only two trips per day for 20 ATB units.

Service Code	Units	Review Results	Total Finding
FTB	3	The individuals were absent	\$36.53
АТВ	22	Two trips where individual was absent and 20 trips from days where 4 trips a day were billed in error	\$552.07
		TOT	AL \$588.60

We also found 64 instances in calendar year 2011 where the County Board billed the daily rate for adult day array services and also billed the 15-minute unit rate for the same individual on the same service date.

We communicated this to DODD, who subsequently performed a sweep of MBS data for calendar years 2009 through 2013 to identify all occurrences of double-billing by the County Board. DODD will

invoice the County Board for all instances of double-billing noted during that time period; therefore, we will not issue recoverable findings in our report.

#### Recommendation:

We recommend the County Board should review current billing practices and develop procedures to ensure services provided are not billed at both a daily rate and a 15-minute unit rate for the same individual on the same service date to remain in compliance with OAC 5123: 2-9-19(I)(6).

2. DODD requested us to report variances if units reimbursed by Medicaid were more than the units reported in the Cost Reports.

We compared the number of reimbursed TCM units and Community Employment units from the MBS Summary by Service Code report, to the final units on Schedule B-4, Quarterly Summary of Units of Service – Service and Support Administration, Line (1)(F), TCM Units and to Schedule B-1, Section B, Attendance Statistics, Line (4)(C), Supported Employment – Community Employment, 15 minute units, respectively.

We found no instance where the Medicaid reimbursed units were greater than audited TCM units. The County Board was not reimbursed for Supported Employment - Community Employment units during 2010 or 2011.

3. DODD requested us to report whether any reimbursements exceeded disbursements on *Schedule A, Summary of Service Costs- By Program* worksheet by two percent.

We compared the amounts reported on *Schedule A, Summary of Service Costs – By Program*, Lines (20), Environmental Accessibility Adaptations to Line (25), Other Waiver Services to the amount reimbursed for these services in 2010 and 2011 on the MBS Summary by Service Code report.

We found no differences.

## Non-Payroll Expenditures and Reconciliation to the County Auditor Report

1. We compared the disbursement totals from the 12/31/2010 and 12/31/2011 County Auditor's report listed on the *Reconciliation to County Auditor Worksheets* to the County Auditor's appropriation history report balances for the (B50) Developmental Disabilities Fund, (S19) Levy Fund, (S20) Title XX, (S21) Lunch, (S30) Early Childhood Construction, and (S40) Residential Facility Fund.

We found differences as reported in Appendix A (2010) and Appendix B (2011).

2. DODD asked us to determine whether total County Board disbursements reported in the *Reconciliation to County Auditor Worksheets* reconciled within 1/4 percent of the County Auditor's yearly report of total disbursements for these funds.

Total County Board disbursements were within 1/4 percent of the County Auditor yearly disbursement totals reported for these funds.

3. We also compared the account description and amount for each reconciling item on the *County Auditor Reconciliation Worksheets* to the County Board's State Expenses Detailed reports and other supporting documentation such as county tax settlement sheets.

We did not perform this procedure since total County Board disbursements were within 1/4 percent of the County Auditor yearly disbursement totals in Procedure 2 above.

4. DODD asked us to compare the County Board's detailed disbursements to the amounts reported on Worksheets 2 through 10, and report variances exceeding \$100 for service contracts and other expenses on any Worksheet.

We compared all service contract and other expenses entries on Worksheets 2 through 10 to the County Board's State Expenses Detailed reports.

We found no differences exceeding \$100 on any worksheet.

5. We compared disbursement entries on Schedule A, Summary of Service Costs – By Program and Worksheets 2 through 10 to the SOCOG prepared County Board Summary Workbook.

We found no differences in 2010. We found differences in 2011 as reported in Appendix B (2011).

6. DODD asked us to determine whether the County Board's detailed disbursements were properly classified within two percent of total service contracts and other expenses for all Worksheets and if any Worksheet included disbursements over \$100 which are non-federal reimbursable under 2 CFR 225 Appendix B.

We scanned the County Board's State Expenses Without Payroll or Benefits Detailed reports for service contracts and other expenses in the following columns and worksheets: Column X-Gen Expense all Programs on Worksheets 2 through 8; Column N-Service and Support Admin Costs on Worksheet 9; and Columns E-Facility Based Services, F-Enclave, and G-Community Employment and H-unassigned on Worksheet 10 and reviewed documentation to identify disbursements not classified as prescribed by the Cost Report Guides or costs which are non-federal reimbursable under 2 CFR 225 Appendix B.

We found differences as reported in Appendix A (2010) and Appendix B (2011) for misclassified and non-federal reimbursable costs.

7. We scanned the County Board's State Expenses Without Payroll or Benefits Detailed reports for items purchased during 2010 and 2011 that met the County Board's capitalization criteria and traced them to inclusion on the County Board's Fixed Asset Listing.

We reported differences for purchases that were not properly capitalized in Appendix A (2010). We found no differences in 2011.

8. We haphazardly selected 20 disbursements from 2010 and 2011 from the County Board's State Expenses Detailed report that were classified as service contract and other expenses on Worksheets 2-10. We determined if supporting documentation was maintained as required by 2 CFR 225 (OMB Circular A-87, Appendix A, (C)(1)(j)) and the disbursement was properly classified according to the Cost Report Guides.

We reported differences from these procedures in Appendix A (2010) and Appendix B (2011) for misclassified and non-federal reimbursable costs.

## **Property, Depreciation, and Asset Verification Testing**

1. We compared the County Board's procedures regarding capitalization of fixed assets with the Cost Report Guides for preparing *Worksheet 1, Capital Costs* and 2 CFR 225 (OMB Circular A-87, Appendix B, 15(a)(2).

We found no inconsistencies between the County Board's capitalization procedures and the guidelines listed above.

2. We compared the County Board's final 2009 Depreciation Schedule to the County Board's 2010 and 2011 Depreciation Schedules for changes in the depreciation amounts for assets purchased prior to the periods under review which were not in compliance with the Cost Report Guides.

We found differences in depreciation as reported in Appendix A (2010) and Appendix B (2011).

3. DODD asked us to compare the depreciation costs reported in the County Board's depreciation schedule to the amounts reported on *Worksheet 1, Capital Costs*, and to report variances exceeding \$100.

We compared all depreciation entries reported on *Worksheet 1, Capital Costs* to the County Board's Depreciation Schedule.

We found differences as reported in Appendix A (2010) and Appendix B (2011).

4. We scanned the County Board's Depreciation Schedule for 2010 and 2011 for depreciation taken on the same asset more than once, assets that have been fully depreciated in prior years, or depreciation taken on assets during the period of acquisition which were not in compliance with the Cost Report Guides.

We found no differences.

5. We haphazardly selected two of the County Board's fixed assets which meet the County Board's capitalization policy and purchased in either 2010 or 2011 to determine if the useful lives agreed to the estimated useful lives prescribed in the 2008 American Hospital Association (AHA) Asset Guide. We also recomputed the first year's depreciation for these assets, based on their cost, acquisition date and useful life to determine compliance with the Cost Report Guides and AHA Asset Guide.

We found no differences in 2010. We found differences in 2011 as reported Appendix B (2011).

6. DODD asked us to haphazardly select the lesser of five percent or 20 disposed assets from 2010 and 2011 from the County Board's list of disposed assets and determined if the asset was removed from the County Board's fixed asset ledger.

We did not perform this procedure because the County Board stated that no capital assets were disposed of in 2010 or 2011. We also scanned the County Board's DD Revenue Received Reports and did not find any proceeds from the sale or exchange of fixed assets.

## **Payroll Testing**

1. DODD asked us to determine whether total County Board salaries and benefits in the 2010 and 2011 Cost Reports were within two percent of the County Auditor's report totals for these funds.

We totaled salaries and benefits from Worksheets 2-10 from the 2010 and 2011 Cost Reports and compared the yearly totals to the County Auditor's Appropriation History reports. The variance was less than two percent in 2010. The variance in 2011 exceeded two percent and was due to misclassified worker's compensation benefits as reported in Appendix B (2011).

2. DODD asked us to compare the County Board payroll disbursements to the amounts reported on worksheets 2 through 10, and to report variances exceeding \$100 for salaries or employee benefit expenses.

We compared all Salary and Employee Benefit entries on worksheets 2 through 10 to the County Board's State Expenses Payroll Only Detail reports.

We found no differences exceeding \$100 for Salary or Employee Benefit expenses on any worksheet.

3. We selected 7 employees and compared the County Board's organizational chart to the worksheet in which each employee's salary and benefit costs were allocated to ensure allocation is consistent with the Cost Report Guides.

We found differences as reported in Appendix A (2010) and Appendix B (2011).

4. DODD asked us to scan the County Board's payroll reports for 2010 and 2011 and compare classification of employees to entries on worksheets 2 through 10 to determine if salary and benefit costs were reported in accordance with the Cost Report Guides if the errors in Procedure 3 above exceeded 10 percent.

We scanned the County Board's State Expenses Payroll Only reports for 2010 and 2011 and compared classification of employees to entries on worksheets 2 through 10 to determine if salary and benefit costs were reported in accordance with the Cost Report Guides.

We found no differences.

### **Medicaid Administrative Claiming (MAC)**

1. DODD asked us to contact its Random Moment Time Study (RMTS) Coordinator to report differences if the MAC salary and benefits versus the County Board's payroll records exceeded one percent or more.

We compared the salary and benefits entered on the Individual MAC Costs by Code and MAC Random Moment Time Summary (RMTS) reports to the County Board's payroll records.

We found no variance exceeding one percent.

2. We compared the original Individual MAC Costs by Code and MAC RMTS Report(s) to Worksheet 6, columns (I) and (O) for both years.

We reported differences for 2010 in Appendix A (2010). We found no differences in 2011.

3. We compared Ancillary Costs on the Roll Up Report for the Ohio Department of Job and Family Services to Lines 6-10 of the *MAC Reconciliation Worksheet*.

We reported differences in Appendix A (2010) and Appendix B (2011).

4. We selected 12 RMTS observed moments completed by employees of the County Board from the DODD RMTS Participant Moments Question and Answer report for the fourth quarter of 2010 and 11 RMTS observed moments from the third quarter of 2011 in which they documented their time spent on administering Medicaid-funded programs. We determined if supporting documentation of the County Board employees' activity for each observed moment was maintained and the observed moment was properly classified in accordance with DODD's Guide to Medicaid Administrative Claiming (MAC) using the Random Moment Time Studies (RMTS) Methodology for 2010 and 2011.

We found one RMTS observed moment for Activity Code 7, Referral, Coordination and Monitoring of Medicaid Services that lacked supporting documentation in 2010. We found no errors in 2011.

We reported these instances of non-compliance to DODD. DODD is currently working with the Ohio Department of Medicaid (ODM) to determine an acceptable methodology to calculate the findings for recovery.

We did not receive a response from officials to the exceptions noted above.

We were not engaged to and did not conduct an audit, the objective of which would be the expression of an opinion on the County Board's Cost Reports. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the use of the managements of the County Board, DODD, the Ohio Department of Medicaid, and the Centers for Medicare and Medicaid Services, and is not intended to be, and should not be used by anyone other than these specified parties.

This report replaces the report for the period of January 1, 2010 to December 31, 2011 previously dated January 17, 2014. You should rely on this report rather than on our report dated January 17, 2014. Under the same authority noted above, the procedures in the Acuity Testing section were completed for 2009, 2010 and 2011 and the report was revised to include 2009, 2010 and 2011 results.

**Dave Yost** Auditor of State

January 17, 2014, except for the Acuity Testing for 2009, 2010 and 2011 which is as of August 21, 2014

cc: Lena Bradford, Superintendent, Brown County Board of DD Tammie Keller, Business Manager, Brown County Board of DD Lizabeth Doss, Board President, Brown County Board of DD



		Reported Amount	С	orrection		Corrected Amount	Explanation of Correction
Schedule B-1, Section A							
Building Services (B) Adult		679		(3)		676	To agree to final 2009 square footage
14. Facility Based Services (B) Adult		15,461		117 (12)		15,566	To reclassify facility based square footage To reclassify MAC square footage
17. Medicaid Administration (A) MAC		-		68		68	To reclassify MAC square footage
21. Service And Support Admin (D) General		504 117		(192)		312	To agree to final 2009 square footage
Program Supervision (B) Adult     Administration (D) General		1,569		(117) (56)		1,513	To reclassify facility based square footage To reclassify MAC square footage
25. Non-Reimbursable (B) Adult		-		` 3		3	To report omitted square footage
Schedule B-1, Section B 2. Days Of Attendance (A) Facility Based Services		13,023		51		13,074	To report days of attendance at Southern Ohio Developmental Center
Schedule B-4 1. TCM Units (D) 4th Quarter		4 407		720		5,127	To cause to compiled emounts
SSA Unallowable Units (D) 4th Quarter		4,407 239		720		246	To agree to compiled amounts  To reclassify unallowable units originally coded as general time units
Worksheet 1							
<ol><li>Buildings/Improve (X) Gen Expense All Prgm.</li></ol>	\$	48,912		2,107			To agree to compiled amounts
Movable Equipment (N) Service & Support Admin     Movable Equipment (V) Admin	\$ \$	82	\$ \$	72 161			To agree to compiled amounts To agree to compiled amounts
Movable Equipment (X) Gen Expenses All Prgm.	\$	161	\$	(161)			To agree to compiled amounts
7. Other (X) Gen Expense All Prgm.	\$	-	\$	117	\$	117	To agree to compiled amounts
Worksheet 2 1. Salaries (X) Gen Expense All Prgm.	\$	81,930	\$	(27,497)			To reclassify MAC amounts
Employee Benefits (X) Gen Expense All Prgm.	\$	37,626	\$ \$	13,630 6,892	\$	68,063	To reclassify salary for administrative clerk To reclassify benefits for administrative clerk
Other Expenses (O) Non-Federal Reimbursable	\$	_	\$	(6,732) 5,462	\$	37,786	To reclassify workers compensation expenses To reclassify non-federal reimbursable expenses
4. Other Expenses (X) Gen Expense All Prgm.	\$	36,828	\$	119 8,725	\$	5,581	To reclassify non-federal reimbursable expenses To reclassify operating leases
			\$	(5,462)			To reclassify non-federal reimbursable expenses
10. Unallowable Fees (O) Non-Federal Reimbursable	\$	73,601	\$	12,432	ф	86,033	To report real estate fees
Worksheet 2A 1. Salaries (E) Facility Based Services	\$	33,507	\$	(19,877) (13,630)	\$		To reclassify salary for 1st line supervisor To reclassify salary for administrative clerk
2. Employee Benefits (E) Facility Based Services	\$	15,131	\$	(8,239)			To reclassify benefits for 1st line supervisor To reclassify benefits for administrative clerk
4. Other Expenses (E) Facility Based Services	\$	3,884	\$	(3,803)			To reclassify direct service expenses To reclassify non-federal reimbursable expenses
Worksheet 3 3. Service Contracts (X) Gen Expense All Prgm.	\$	54,027	\$	(5,826)	\$	48,201	To reclassify capital asset
Worksheet 5 2. Employee Benefits (M) Family Support Services	\$	674	\$	67	\$	741	To reclassify workers compensation expenses
Worksheet 6 1. Salaries (O) Non-Federal Reimbursable	\$	-	\$	45,873	\$	45,873	To reclassify MAC amounts
Worksheet 9				(0.500)	•	400.040	7
Salaries (N) Service & Support Admin. Costs     Employee Benefits (N) Service & Support Admin. Costs	\$ \$	135,384 40,797	\$ \$	(6,566) 2,183			To reclassify MAC amounts To reclassify workers compensation expenses
Other Expenses (N) Service & Support Admin. Costs	\$	6,432		(119)			To reclassify non-federal reimbursable expenses
Worksheet 10 1. Salaries (E) Facility Based Services	\$	258,397	\$	(11,810)	•		To reclassify MAC amounts
2. Employee Benefits (E) Facility Based Services	\$	73,620	\$ \$	19,877 8,239			To reclassify salary for 1st line supervisor To reclassify benefits for 1st line supervisor
4. Other Expenses (E) Facility Based Services	\$	12,680	\$	4,482 3,803			To reclassify workers compensation expenses To reclassify direct service expenses
4. Other Expenses (O) Non-Federal Reimbursable	\$	-	\$	(254) 254	\$	16,229	To reclassify non-federal reimbursable expenses To reclassify non-federal reimbursable expenses
. ,			\$	81	\$	335	To reclassify non-federal reimbursable expenses
Reconciliation to County Auditor Worksheet							
Expense: Plus: Real Estate Fees	\$	_	\$	(12,432)	œ	(12,432)	To reconcile off real estate fees
Plus: Leases And Rentals	\$	8,725	\$	(8,725)			To reclassify operating leases
Plus: Purchases Greater Than \$5,000	\$	14,500	\$	5,826	\$	20,326	To reclassify capital asset
Less: Capital Costs Total from 12/31 County Auditor's Report	\$ \$	(49,358) 1,751,187		(2,296) 9		(51,654) 1,751,196	To reconcile off depreciation To agree to County Auditor totals
·	ψ	1,701,107	Ψ	3	ψ	1,751,150	. ag. so to obuing munior totals
Revenue: Total from 12/31 County Auditor's Report	\$	2,782,192	\$	10	\$	2,782,202	To agree to County Auditor totals
Medicaid Administration Worksheet Lines 6 -10 Ancilary Costs	\$	-	\$	4,258	\$	4,258	To report ancilary costs

	Reported Amount	Correc	tion	Corrected Amount	Explanation of Correction
Schedule B-1, Section A  1. Building Services (B) Adult  14. Facility Based Services (B) Adult	679 15,461		(3) 117	676	To agree to final 2009 square footage To reclassify facility based square footage
	13,401		(12)	15,566	To reclassify MAC square footage
17. Medicaid Administration (A) MAC 21. Service And Support Admin (D) General	504		68 (192)	68 312	To reclassify MAC square footage To agree to final 2009 square footage
22. Program Supervision (B) Adult	117		(117)	-	To reclassify facility based square footage
23. Administration (D) General 25. Non-Reimbursable (B) Adult	1,569		(56) 3	1,513 3	To reclassify MAC square footage To report omitted square footage
			Ü	Ü	To roport officed equal of rootings
Schedule B-1, Section B 1. Total Individuals Served By Program (A) Facility Based Services 2. Days Of Attendance (A) Facility Based Services	90 13,129		(2) 43	88 13,172	To agree to compiled amounts To report days of attendance at Southern Ohio Developmental Center
Schedule B-3 5. Facility Based Services (G) One Way Trips- Fourth Quarter	4,593	6,	,083	10,676	To agree to compiled amounts
Schedule B-4					
2. Other SSA Allowable Units (D) 4th Quarter	325		(180)	145	To agree to compiled amounts
<ol> <li>SSA Unallowable Units (A) 1st Quarter</li> <li>SSA Unallowable Units (B) 2nd Quarter</li> </ol>	155 1,152		(155) (152)	-	To agree to compiled amounts To agree to compiled amounts
<ol><li>SSA Unallowable Units (C) 3rd Quarter</li></ol>	1,430		,430)	400	To agree to compiled amounts
5. SSA Unallowable Units (D) 4th Quarter	980	(	(491)	489	To agree to compiled amounts
Schedule C					
I. County (B) Interest- COG Revenue	\$ -	\$ 7,	,488	\$ 7,488	To agree to audited COG amounts
Worksheet 1	© 40.261	• 1	,107	£ 51.260	To agree to compiled amounts
Buildings/Improve (X) Gen Expense All Prgm.     Movable Equipment (N) Service & Support Admin	\$ 49,261 \$ 82			\$ 51,368 \$ 154	To agree to compiled amounts To agree to compiled amounts
Movable Equipment (U) Transportation	\$ -			\$ 3,263	To agree to compiled amounts
7. Other (X) Gen Expense All Prgm.	\$ -	\$	117	\$ 117	To agree to compiled amounts
Worksheet 2	. (40.000		400	n 10.100	To analyze Warrelow Years Indicators the state of
Salaries (X) Gen Expense All Prgm.     Employee Benefits (X) Gen Expense All Prgm.	\$ (10,988) \$ 32,219		,120 709	\$ 10,132	To reclassify salary for administrative clerk To reclassify workers compensation expenses
		\$ 6,	,337	\$ 39,265	To reclassify benefits for administrative clerk
Other Expenses (O) Non-Federal Reimbursable     Other Expenses (X) Gen Expense All Prgm.	\$ - \$ 112,118		886 ,079)	\$ 886	To reclassify non-federal reimbursable expenses To reclassify workers compensation expenses
	*,	\$ (13,	,096)		To reclassify non-federal reimbursable fees
10. Unallowable Fees (O) Non-Federal Reimbursable	\$ 117,322		(886) ,096	\$ 91,057	To reclassify non-federal reimbursable expenses To reclassify non-federal reimbursable fees
	*,		,349)	\$ 110,069	To correct real estate fees
Worksheet 2A					
Salaries (E) Facility Based Services	\$ 40,879		,759)	_	To reclassify salary for 1st line supervisor
2. Employee Benefits (E) Facility Based Services	\$ 11,714		,120) ,377)	\$ -	To reclassify salary for administrative clerk To reclassify benefits for 1st line supervisor
		\$ (6,	,337)		To reclassify benefits for administrative clerk
Other Expenses (E) Facility Based Services     Other Expenses (N) Service & Support Admin	\$ 22,339 \$ 470		,339) (470)		To reclassify direct service expenses To reclassify SSA expenses
			,		
Worksheet 5 2. Employee Benefits (M) Family Support Services	\$ 707	\$	70	\$ 777	To reclassify workers compensation expenses
Other Expenses (L) Community Residential	\$ 68,911	\$ (68,	,240)	\$ 671	To reclassify fees paid to COG
5. COG Expenses (O) Non-Federal Reimbursable	\$ -	\$ 4,	,892	\$ 4,892	To agree to audited COG amounts
Worksheet 9				_	
Salaries (N) Service & Support Admin. Costs     Employee Benefits (N) Service & Support Admin. Costs	\$ 41,358	\$ 2.		\$ - \$ 43,406	To reclassify workers compensation expenses
3. Service Contracts (N) Service & Support Admin. Costs				\$ -	, , , , ,
Other Expenses (N) Service & Support Admin. Costs     COG Expenses (N) Service & Support Admin. Costs	\$ 6,519 \$ -			\$ 6,989 \$ 13,727	To reclassify SSA expenses To agree to audited COG amounts
	•	<b>v</b> .0,		ψ .0,.2.	To agree to addited one amounts
Worksheet 10 1. Salaries (E) Facility Based Services	\$ 244,421	\$ 1Q	759	\$ 264.180	To reclassify salary for 1st line supervisor
Employee Benefits (E) Facility Based Services	\$ 64,704		,377	Ψ 204,100	To reclassify benefits for 1st line supervisor
Service Contracts (H) Unasgn Adult Program	\$ 35,174			\$ 74,332 \$ 57,513	To reclassify workers compensation expenses To reclassify direct service expenses
5. COG Expenses (E) Facility Based Services	\$ 33,174			\$ 25,368	To agree to audited COG amounts
a1 adult 10					
8. Facility Based Services (B) Less Revenue	\$ -	\$ 25,	,000	\$ 25,000	To off-set privatization costs
Reconciliation to County Auditor Worksheet					
Expense:	6 (50.010		240	e (00.07°)	To second off and extended
Plus: Real Estate Fees Plus: Fees Paid To COG, Or Payments And Transfers made To COG	\$ (53,619) \$ -		,349 ,240	\$ (33,270) \$ 68,240	To reconcile off real estate fees To reclassify fees paid to COG
•					, ,
Less: Capital Costs Total from 12/31 County Auditor's Report	\$ (49,705) \$ 1,946,032		,558) 640	\$ (55,263) \$ 1,946,672	To reconcile off depreciation To agree to County Auditor totals
·	₩ 1,5 <del>4</del> 0,032	¥	540	ψ 1,0 <del>1</del> 0,012	10 agros to county radical totals
Revenue: Less: COG Revenue	\$ -	\$ (7,	,488)	\$ (7,488)	To reconcile off COG revenues
	•	Ψ ( <i>I</i> ,	, .50)	÷ (1,400)	
Medicaid Administration Worksheet Lines 6 -10 Ancilary Costs	\$ -	\$ 6,	,213	\$ 6,213	To report ancilary costs
Elios o To Allollary Costs	-	ψ 0,	,_,0	Ψ 0,213	To report arioliary costs



## **BROWN COUNTY BOARD OF DEVELOPMENTAL DISABILITIES**

## **BROWN COUNTY**

### **CLERK'S CERTIFICATION**

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

**CLERK OF THE BUREAU** 

Susan Babbitt

CERTIFIED SEPTEMBER 4, 2014