



OHIO AUDITOR OF STATE  
**KEITH FABER**





# 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 Lake 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 Attendance Summary for accuracy. There were no computational errors. We compared the attendance summary to the reported number of individuals served and days of attendance on the *Attendance Statistics form* and to the Cost Report Guide. We found 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 the attendance summary to the Cost Report. There were no differences.

### Allocation Statistics - Transportation

We scanned the Summary by Service Code for the period January 1, 2022 through December 31, 2022 and found no paid waiver transportation services.

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

1. We footed the County Board's Receivable Billing Reimbursable Summary reports 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 reports with the Cost Report. We found no variances exceeding two percent of total units on each row.

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 paid adult services and we selected 25 services among all adult waiver service codes.

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	18	Units billed for direct service activity.	\$246.45
TCM	17	Units billed by two SSAs for same activity at the same time	\$231.32
		<b>Total</b>	<b>\$477.77</b>

3. 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.
4. We scanned the Summary by Service Code report for the period January 1, 2022 through December 31, 2022 and found no paid waiver transportation services.

**Non-Payroll Expenditures**

1. We traced non-payroll expenditures on the Cost Report Input Sheet to the amounts reported on the CBCR forms for indirect costs, program supervision, adult transportation services, SSA and adult programs. We found no variances exceeding \$500 that resulted in reclassification to another worksheet/form.
2. We selected 60 non-payroll disbursements from the service contracts and other expenses 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 for misclassified costs and non-federal reimbursable costs. For any errors, we scanned the Cost Report Transaction report for other like errors in the same cost center. We found additional similar errors. We totaled all identified errors as reported in the Appendix.

**Non-Payroll Expenditures (Continued)**

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 Cost Report Input Sheet to the amounts reported on the worksheets/forms for indirect costs, program supervision, SSA and adult programs. There were no variances.
2. We selected 40 employees from the Salary report, including the SSA Director and Assistant Director, from cost categories that contribute to Medicaid rates. For the employees selected, we compared the organizational chart, Salary report, Units by Case Manager report and job descriptions and basis for allocation to the worksheet in which each employee's salary and benefit costs were allocated to and to the Cost Report Guide. There were variances as reported in the Appendix.
3. We confirmed that the misclassification errors identified in the employee payroll testing did not exceed 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 from the Burdened Salary, Accumulators and AP Benefit reports for the Random Moment Time Study (RMTS) participants for the first quarter 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.
2. For the 13 RMTS observed 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.

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Independent Accountant's Report on  
Applying Agreed-Upon Procedures  
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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.

A handwritten signature in black ink that reads "Keith Faber". The signature is written in a cursive, flowing style.

Keith Faber  
Auditor of State  
Columbus, Ohio

July 5, 2024

**Appendix**  
**Lake County Board of Developmental Disabilities**  
**2022 Cost Report Adjustments**

	<b>Reported Amount</b>	<b>Correction</b>	<b>Corrected Amount</b>	<b>Explanation of Correction</b>
<b>Annual Summary of Units of Service - Service and Support Administration</b>				
TCM Units, CB Activity	82,078	(17)		To reclassify units charged by 2 SSAs for same service at the same time to unallowable
		(18)	82,043	To reclassify units for direct service to unallowable
SSA Unallowable Units, CB Activity	552	17		To reclassify units charged by 2 SSAs for same service at the same time to unallowable
		18	587	To reclassify units for direct service to unallowable
<b>Indirect Cost Allocation</b>				
Salaries, Gen Expense All Program	\$ 2,150,714	\$ (4,920)		To reclassify the Provider Resource Coordinator salary
		\$ (6,981)		To reclassify the SSA Business Ma
		\$ (8,353)	\$ 2,130,460	To reclassify the SSA Supervisor salary
Employee Benefits, Gen Expense All Program	\$ 886,738	\$ (1,041)		To reclassify the Provider Resource Coordinator benefits
		\$ (3,139)		To reclassify the SSA Business Manager benefits
		\$ (4,702)	\$ 877,856	To reclassify the SSA Supervisor benefits
Other Expenses, Gen Expense All Program	\$ 262,706	\$ (3,138)		To reclassify sponsorship and golf outing costs to non-federal reimbursable costs
		\$ (20,000)	\$ 239,568	To reclassify sponsorship costs to non-federal reimbursable costs
Other Expenses, Non-Federal Reimbursable	\$ 484,962	\$ 3,138		To reclassify sponsorship and golf outing costs to non-federal reimbursable costs
		\$ 20,000		To reclassify sponsorship costs to non-federal reimbursable costs
		\$ 5,961	\$ 514,061	To reclassify salary and benefits of Provider Resource coordinator
<b>Program Supervision</b>				
Salaries, Service & Support Admin	\$ 29,610	\$ (8,007)	\$ 21,603	To reclassify the Service & Support Comp Manager salary
Employee Benefits, Service & Support Admin	\$ 11,534	\$ (3,366)	\$ 8,168	To reclassify the Service & Support Comp Manager benefits
Service Contracts, Unassign Children Program	\$ 1,052	\$ (68)		To reclassify DSP Appreciation costs
		\$ (318)	\$ 666	To reclassify training costs benefitting waiver providers

**Appendix**  
**Lake County Board of Developmental Disabilities**  
**2022 Cost Report Adjustments**

	<b>Reported Amount</b>	<b>Correction</b>	<b>Corrected Amount</b>	<b>Explanation of Correction</b>
<b>Program Supervision (Continued)</b>				
Service Contracts, Facility Based Services	\$ 3,094	\$ (179)		To reclassify DSP Appreciation costs
		\$ (831)	\$ 2,084	To reclassify training costs benefitting waiver providers
Service Contracts, Co. Board Operated ICF/IID	\$ 1,037	\$ (150)		To reclassify DSP Appreciation costs
		\$ (698)	\$ 189	To reclassify training costs benefitting waiver providers
Service Contracts, Non-Federal Reimbursable	\$ 14,591	\$ 179		To reclassify DSP Appreciation costs
		\$ 831		To reclassify training costs benefitting waiver providers
		\$ 68		To reclassify DSP Appreciation costs
		\$ 318		To reclassify training costs benefitting waiver providers
		\$ 150		To reclassify DSP Appreciation costs
		\$ 698	\$ 16,835	To reclassify training costs benefitting waiver providers
<b>Services and Support Admin</b>				
Salaries, Service & Support Admin Costs	\$ 1,820,642	\$ 6,981		To reclassify the SSA Business Manager salary
		\$ 8,353		To reclassify the SSA Supervisor salary
		\$ 8,007	\$ 1,843,983	To reclassify the Service & Support Comp Manager salary
Employee Benefits, Service & Support Admin Costs	\$ 719,806	\$ 3,139		To reclassify the SSA Business Manager benefits
		\$ 4,702		To reclassify the SSA Supervisor benefits
		\$ 3,366	\$ 731,013	To reclassify the Service & Support Comp Manager benefits



# OHIO AUDITOR OF STATE KEITH FABER



**LAKE COUNTY BOARD OF DEVELOPMENTAL DISABILITIES**

**LAKE 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 8/6/2024**

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This report is a matter of public record and is available online at  
[www.ohioauditor.gov](http://www.ohioauditor.gov)