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September 23, 2026

State Representative Michael D. Dovilla
Ohio House of Representatives
77 South High Street, 13th Floor
Columbus, OH 43215

Re: AOS audit of Ohio Department of Medicaid Aged, Blind and Disabled program

Dear Representative Dovilla:

As you are aware, the 136th General Assembly's House Bill 96 required the Ohio Auditor of State ("AOS") to perform an eligibility audit of individuals who received Ohio Department of Medicaid Aged, Blind and Disabled ("ABD") benefits.

My office issued a preliminary report in the public interest on September 22, 2026, detailing our assessment of a sample of ABD beneficiaries. Our preliminary audit supports your concerns that individuals are receiving Medicaid ABD benefits that do not meet eligibility standards[1] and sets the stage for AOS to conduct the full audit required by House Bill 96. The question our full audit will answer is: How large is the group of individuals receiving ABD benefits that are, in fact, ineligible?

I am writing to highlight some additional statistical findings and observations.

A major roadblock to AOS's timely completion of the full audit of the ABD programs required under HB 96 is the generation of a clean data set from the Ohio Department of Medicaid and their third-party vendor for a fixed period of time that details the information needed to make complete eligibility determinations – including asset verifications for each ABD benefit recipient. While not subject to the same rigor as our preliminary audit, we did review a comprehensive data pull of the ABD population as of June 2025 to gain a glimpse into the possible broader program exposure[2].

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[1] In fact, 3% of those sampled had resources beyond those allowed to remain eligible to receive the ABD benefits, including several individuals who had more than a million dollars. More than 3,000 people who died also continued to have benefits paid on their behalf.

[2] The June 2025 data pull contains personal protected information that is not subject to public disclosure in the format received, but the data was reviewed by ODM. In conducting the full audit required by HB 96, AOS will have the legal right to receive and fully analysis the complete data set provided by ODM and their third-party vendor. The final audit will also be able to detail our findings without revealing individual PPI.

This review revealed that the eligibility determination problem is likely broader than the findings detailed in our preliminary audit.

Key Findings and Observations:

- **AOS's preliminary audit finding from sample of recipients, Jan. 1, 2024 – Dec. 31, 2025:** As detailed in our September 22nd audit, 17,278 individuals were found to be over the $2,000 asset threshold. Further AOS analysis confirmed that 11,809 individuals were over their respective resource threshold (ranging from $2,000 to $14,848, depending on their enrolled benefit category).
- J**une 2025 snapshot observations: A** review of the complete resource data pull from ODM's vendor suggests 37,596 individuals are over the $2,000 threshold. After some additional AOS analysis of the data pull, the number drops to 31,707 individuals over their respective resource threshold. Of those 31,707 ABD beneficiaries, 13,927 (44%) came from the Social Security Administration's Supplemental Security Income program category, which under the state's current agreement with the federal government would not require ODM to run a resource test as part of eligibility determination.

You and I agree that Ohio's safety net programs are meant to protect and support our most vulnerable citizens. These finite publicly funded resources should not be provided to individuals who have significant personal assets and resources. Our preliminary audit and additional observations point to a systemic failure in how ODM adjudicates asset verifications. When proper departmental oversight fails, hardworking taxpayers are left footing the bill and the integrity of the entire program is compromised.

Thank you for your continued dedication to protecting Ohio taxpayers and ensuring the financial health and proper administration of Ohio's Medicaid and safety net programs as we move forward with this important project.

Keith Faber

Keith Faber
Auditor of State