



OHIO AUDITOR OF STATE  
**KEITH FABER**





# OHIO AUDITOR OF STATE KEITH FABER



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## Independent Accountants' 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 recorded in the County Board Cost Report System (Cost Report) of the Clearwater Council of Governments (COG) for the year ended December 31, 2020 and certain compliance requirements related to the completion of the Cost Report included in the information provided to us by the management of the COG. The COG's management is responsible for the data in the Cost Report and compliance with applicable requirements included in the information provided to us by the COG.

The Ohio Department of Developmental Disabilities (Department) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of providing assistance in the evaluation of the COG's disbursements recorded in the Cost Report for the year ended December 31, 2020, and certain compliance requirements related to the Cost Report. 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:

### Trial Balance and Non-Payroll Expenditures

The procedures in this section were performed on the following categories: Indirect Costs, Program Supervision, Transportation Services, Service and Support Administration and Adult Programs.

1. We compared disbursements for the selected categories from the Trial Balance to the Expense Crosswalk and Payroll Allocation worksheets and from the worksheets to the *COG Reconciliation* form, *COG Master*, *Summary of Expenditures* and *County Expenditures* forms. We also compared these expenses to and to DODD's Guide to Preparing Income and Expenditure Reports for use by COGs. There were no variances exceeding two percent.
2. We selected 62 non-payroll disbursements for the selected categories from the General Ledger and determined if supporting documentation was maintained, costs were allowable per and 2 CFR 200.420 - .475 and properly classified according to *DODD's Guide to Preparing Income and Expenditure Reports for use by COGs and for use by County Boards of Developmental Disabilities* (Cost Report Guides). There were variances exceeding \$500 as reported in the Appendix.
3. We inquired with the COG if any statistics were omitted from the Cost Report and not communicated to member county boards. The COG confirmed all statistics were communicated to the County Boards.

**Trial Balance and Non-Payroll Expenditures (Continued)**

4. For the selected categories, we scanned the Payroll Allocation worksheet, employee list and job descriptions and compared classification of employees to entries on the COG Master and County Expenditure forms and to the Cost Report Guides. There were no variances.

**Medicaid Administrative Claiming (MAC)**

1. We compared the actual salaries and benefits for the Random Moment Time Study (RMTS) participants from the IHAC Expense Report and Wages Calculation and Insurance worksheets for the first quarter to the salaries and benefits submitted on the Cost by Individual Report. We confirmed that the actual salaries and benefits were greater than the MAC salaries and benefits.
2. We confirmed that the supporting documentation for 12 RMTS observed moments selected by the Department contained the date and time of the moment and the detail needed to sport the activity performed. We found one moment without any supporting documentation to confirm the reported activity. We shared the detailed results with the Council of Government and the Department.

We compared the Medicaid rate that corresponds to the documented activity to the Guide to Medicaid Administrative Claiming (MAC) using the Random Moment Time Studies (RMTS) Methodology, Attachment B for the remaining 11 confirmed moments. We found no variances.

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 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 COG's Cost Report and its compliance with certain requirements 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 COG and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.



Keith Faber  
Auditor of State  
Columbus, Ohio

June 16, 2022

**Appendix  
Clearwater Council of Governments  
2020 Cost Report Adjustments**

	<b>Reported Amount</b>	<b>Correction</b>	<b>Corrected Amount</b>	<b>Explanation of Correction</b>
<b>Clearwater COG</b>				
<b>Indirect Cost COG</b>				
Other Expenses	\$ 639,408	\$ (290,000)		To record Advances to Partners in Community that were repaid
		\$ (808)		To reclassify computer costs related to early intervention employee
		\$ (7,000)		To reclassify job related costs without stats as Nonfederal Reimbursable costs
		\$ (1,750)		To reclassify job related costs without stats as Nonfederal Reimbursable costs
		\$ (1,000)		To reclassify Erie, Huron, Morrow, Marion giftcards as Non-Federal Reimbursable and Community Residential costs
		\$ (1,000)		To reclassify sponsorship costs as non-federal reimbursable costs
		\$ (1,000)		To reclassify sponsorship costs as non-federal reimbursable costs
		\$ (1,255)		To reclassify appreciation gift baskets as non-federal reimbursable costs
		\$ (574)		To reclassify logo shirts for cog staff as non-federal reimbursable costs
		\$ (550)		To reclassify shower costs as community residential costs
		\$ (2,260)	\$ 332,211	To reclassify Building Services costs
<b>Building Services Cost COG</b>				
Other Expenses	\$ 13,585	\$ 2,260	\$ 15,845	To reclassify Building Services costs
<b>Medicaid Administrative Claiming COG</b>				
<b>Non-Federal Reimbursable</b>				
Other Expenses	\$ 3,100	\$ 200		To reclassify provider appreciation gift cards as non-federal reimbursable costs
		\$ 50		To reclassify gift cards as non-federal reimbursable costs
		\$ 225		To reclassify appreciation gift cards as non-federal reimbursable costs
		\$ 1,000		To reclassify sponsorship costs as non-federal reimbursable costs
		\$ 1,000		To reclassify sponsorship costs as non-federal reimbursable costs
		\$ 1,255		To reclassify appreciation gift baskets as non-federal reimbursable costs
		\$ 574	\$ 7,404	To reclassify logo shirts for cog staff as non-federal reimbursable costs
<b>COG Reconcile Expenses</b>				
<b>COG Reconcile Expenses Detail</b>				
Advances for Partners in Community	\$ -	\$ 290,000	\$ 290,000	To record Advances to Partners in Community that were repaid

**Appendix  
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2020 Cost Report Adjustments**

	<b>Reported Amount</b>	<b>Correction</b>	<b>Corrected Amount</b>	<b>Explanation of Correction</b>
<b>Crawford County</b>				
<b>Other Program</b>				
<b>Adult Program COG Expenses</b>				
Non-Federal Reimbursable		\$ 7,000	\$ 7,000	To reclassify job related costs without stats as Nonfederal Reimbursable.
<b>Erie County</b>				
<b>Children Program</b>				
<b>Direct Services COG Expenses</b>				
Early Intervention	\$ -	\$ 755	\$ 755	To reclassify computer costs related to early intervention employee
<b>Other Program</b>				
<b>Direct Services COG Expenses</b>				
Community Residential	\$ 54,374	\$ 250	\$ 54,624	To reclassify supported living supplies as Community Residential
<b>Huron County</b>				
<b>Children Program</b>				
<b>Direct Services COG Expenses</b>				
Early Intervention	\$ -	\$ 53	\$ 53	To reclassify computer costs related to early intervention employee
<b>Other Program</b>				
<b>Direct Services COG Expenses</b>				
Community Residential	\$ 64,587	\$ 75	\$ 64,662	To reclassify supported living supplies as Community Residential
<b>Marion County</b>				
<b>Other Program</b>				
<b>Adult Program COG Expenses</b>				
Non-Federal Reimbursable		\$ 1,750	\$ 1,750	To reclassify job related costs without stats as Nonfederal Reimbursable.
<b>Direct Services COG Expenses</b>				
Community Residential	\$ 10,581	\$ 550		To reclassify shower costs as community residential costs
		\$ 150	\$ 11,281	To reclassify supported living supplies as Community Residential
<b>Morrow County</b>				
<b>Other Program</b>				
<b>Direct Services COG Expenses</b>				
Community Residential	\$ 77,250	\$ 50	\$ 77,300	To reclassify supported living supplies as Community Residential

# OHIO AUDITOR OF STATE KEITH FABER



**CLEARWATER COUNCIL OF GOVERNMENTS**

**OTTAWA 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 7/12/2022**

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