



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 Lorain County Board of Developmental Disabilities (County Board) for the year ended December 31, 2020 and certain compliance requirements related to the completion of the Cost Report and Medicaid paid 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, 2020 and certain compliance requirements related to the Cost Report and Medicaid paid services included in the information provided to us by the County Board.

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 County Board's disbursements and statistical data recorded in the Cost Report for the year ended December 31, 2020, and certain compliance requirements related to the Cost Report and Medicaid paid 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 that it did not render any paid Medicaid waiver services for only a portion of calendar year 2020.

### **Allocation Statistics - Attendance**

1. We footed the Adult Attendance Detail 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 and found no variances greater than two percent of attendance statistics at each acuity level.

2. We scanned the attendance reports from June 1 to December 31, 2020 and there were differences in acuity as reported in the Appendix.

3. We traced the total attendance days for five individuals for each service type for one month during January to May and one month during June to December months from the daily attendance documentation and attendance reports to the Cost Report. There was a difference as reported in the Appendix.

**Allocation Statistics - Transportation**

1. We footed the Transportation Summary and Transportation Detailed and School reports for accuracy. There were no computational errors. We compared the total number of one-way trips from the transportation reports to the Cost Report. There was a variance greater than two percent as reported in the Appendix.
2. We traced the number of trips for 10 individuals for one month from the daily service documentation to the transportation reports and the Cost Report. There was a variance greater than 10 percent of total trips tested as reported in the Appendix.
3. There were no cost of bus tokens/cabs reported and we inspected the SAC Expense Detail reports and found no omitted costs.

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

1. We footed the County Board's All Consumer Detailed TCM 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. There were no variances greater than two percent of total units on each row.
2. We selected 60 Other SSA Allowable units 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. We found no noncompliance with the documentation elements.

**Paid Claims**

1. We selected 50 claims paid among adult services and transportation services from the Summary by Service Code report. We compared the County Board's service documentation to the requirements of each respective service code per Ohio Admin. Code Chapter 5123:2-9 and 5123-9<sup>1</sup> in effect at the time of service delivery. We found instances of non-compliance and calculated recoverable findings as described below and reported corresponding unit adjustments in the Appendix.

<b>Service Code</b>	<b>Units</b>	<b>Non-TCM Review Results</b>	<b>Finding</b>
ADF	144	Units billed in excess of actual duration of service delivery	\$ 215.52
FDF	136	Units billed in excess of actual duration of service delivery	\$ 157.65
ATB	2	Lack of supporting documentation	\$ 33.45
		<b>Total</b>	<b>\$406.62</b>

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 no instances of non-compliance.
3. We compared the number of reimbursed TCM units from the MBS summary to the final units reported. We confirmed that total reimbursed units were less than final TCM units.

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<sup>1</sup> Sections of Chapter 5123:2-9 were repealed during the Cost Report period and became effective in Chapter 5123-9; certain changes may affect service documentation requirements

### **Paid Claims (Continued)**

4. The County Board's 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.
5. We confirmed through inquiry that the County Board does not contract for transportation services that are available to the general public.

### **Non-Payroll Expenditures**

1. We selected 60 disbursements from the service contracts and other expenses on the SAC Expense Detail report from cost categories that contribute to Medicaid rates. We compared the County Board's supporting documentation to the Cost Report Guide and 2 CFR 200.420 - .475. There were variances exceeding two percent and non-federal reimbursable costs exceeding \$500 as reported in the Appendix.
2. We confirmed that the County Board's reconciled its income and expenditures for one month in each quarter in accordance with Ohio Admin. Code § 5123-4-01(N)(1).
3. 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 costs or square footage without final attendance statistics.

### **Payroll**

1. We compared the salaries and benefit costs on the Salary Allocation and YTD Health worksheets and SAC Expense Detailed report to the amounts reported on the worksheets/forms. There were no variances.
2. We selected 40 employees and compared the organizational chart, job descriptions, SAC Expense Detail report and YTD Health Worksheets to the worksheet in which each employee's salary and benefit costs were allocated to ensure the allocation is consistent with the Cost Report Guide. There were no variances.
3. 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 from the MAC salaries and Benefits worksheet, Salaries IHAC vs ABRA, and SAC Detailed Expense reports 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. We confirmed that the supporting documentation for 11 RMTS observed moments selected by the Department contained the date and time of the moment and the detail needed to support the activity performed.

**Medicaid Administrative Claiming (Continued)**

We reviewed responses and documentation for the 11 RMTS moments and 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 and 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 was not aware of any areas that might impact the 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 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  
October 5, 2022

**Appendix  
Lorain County Board of Developmental Disabilities  
2020 Cost Report Adjustments**

	<b>Reported Amount</b>	<b>Correction</b>	<b>Corrected Amount</b>	<b>Explanation of Correction</b>
<b>Attendance Statistics</b>				
<b>Adult Program</b>				
<b>Total Days of Attendance by Acuity</b>				
Days of Attendance, Facility Based Services, Acuity A	18,571	(3,504)	15,067	To reclassify June-December Days to Acuity C
Days of Attendance, Facility Based Services, Acuity B	3,680	(654)		To reclassify June-December Acuity B Days to Acuity C
Days of Attendance, Facility Based Services, Acuity C	8,048	3,504		To reclassify June-December Acuity A Days to Acuity C
		654	12,206	To reclassify June-December Acuity B Days to Acuity C
Days of Attendance, Supported Emp. Enclave, Acuity A	4,729	2	4,731	To add days based on daily attendance documentation
Individuals Served, Facility Based Services, Acuity A	488	(40)	448	To agree to attendance report
<b>Annual Summary of Transportation Services</b>				
<b>Non-Title XX-Adult</b>				
Facility Based Services, CB One Way Trips	32,312	745		To agree to transportation report
		(1)		To remove a trip for lack of supporting documentation
		(1)	33,055	To remove a trip for lack of supporting documentation
Supported Emp. - Comm. Emp., CB One Way Trips	2,989	(39)	2,950	To remove trips based on daily service logs
<b>Indirect Cost Allocation</b>				
Other Expenses, Gen Expense All Program	\$ 81,134	\$ 5,846		To reclassify payroll software module
		\$ 11,937		To reclassify HR/Payroll/Training/Recruiting software modules
		\$ 33,330		To reclassify Digital Asset Security Software
		\$ 24,613		To reclassify GateKeeper Software costs
		\$ 5,469		To reclassify payroll software and support costs
		\$ 21,577		To reclassify ABRA Suite costs
		\$ 35,698		To reclassify ABRA Suite costs

**Appendix**  
**Lorain County Board of Developmental Disabilities**  
**2020 Cost Report Adjustments**

	<b>Reported Amount</b>	<b>Correction</b>	<b>Corrected Amount</b>	<b>Explanation of Correction</b>
<b>Indirect Cost Allocation</b>				
Other Expenses, Gen Expense All Program (Continued):		\$ 4,663		To reclassify Infallible software support costs
		\$ 5,370		To reclassify an invoice for Hand Sanitizer
		\$ (13,960)		To reclassify legal service costs without supporting documentation to non-federal reimbursable costs.
		\$ (13,960)		To reclassify legal service costs without supporting documentation to non-federal reimbursable costs.
Non-Federal Reimbursable, Other Expenses	\$ 171,276	\$ 13,960	\$ (3,916)	\$ 197,801 To reclassify employee gift cards to non-federal reimbursable costs
		\$ 13,960		To reclassify legal service costs without adequate supporting documentation to non-federal reimbursable costs.
		\$ 3,916	\$ 203,112	To reclassify an NFR expense for employee gift cards
<b>Building Services</b>				
General Expense All Programs, Service Contracts	\$ 12,536	\$ 23,114	\$ 35,650	To reclassify a telephone service agreement costs
<b>Direct Services</b>				
Community Residential, Other Expenses	\$ 141,146	\$ 7,174	\$ 148,320	To reclass housing relocation costs
<b>Services and Support Admin</b>				
Other Expenses, Service & Support Admin Costs	\$ 336,961	\$ (5,846)		To reclassify payroll software module
		\$ (11,937)		To reclassify HR, Payroll, Training, Recruiting software modules
		\$ (33,330)		To reclassify Digital Asset Security Software costs
		\$ (24,613)		To reclassify GateKeeper Software costs
		\$ (5,469)		To reclassify payroll software and support costs
		\$ (23,114)		To reclassify a telephone service agreement costs



**Appendix**  
**Lorain County Board of Developmental Disabilities**  
**2020 Cost Report Adjustments**

	<b>Reported Amount</b>	<b>Correction</b>	<b>Corrected Amount</b>	<b>Explanation of Correction</b>
<b>Services and Support Admin</b>				
Other Expenses, Service & Support				
Admin Costs (Continued)		\$ (21,577)		To reclassify ABRA Suite costs
		\$ (35,698)		To reclassify ABRA Suite costs
		\$ (4,663)	\$ 170,714	To reclassify Infallible software support costs
<b>Adult Program</b>				
Other Expenses, Facility Based				
Services	\$ 204,165	\$ (5,370)		To reclassify hand sanitizer costs
		\$ (7,174)	\$ 191,621	To reclass housing relocation costs

# OHIO AUDITOR OF STATE KEITH FABER



**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 10/25/2022**

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