



OHIO AUDITOR OF STATE
KEITH FABER



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INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR REQUIREMENTS OF THE MEDICAID PROGRAM APPLICABLE TO SELECT PRIVATE DUTY NURSING SERVICES

Ohio Department of Medicaid
50 West Town Street, Suite 400
Columbus, Ohio 43215

RE: Care Stream Agency LLC
Ohio Medicaid Number: 0382671
NPI: 1518448570

We examined compliance with specified Medicaid requirements for provider qualifications, service documentation and service authorization related to the provision of private duty nursing (PDN) services during the period of January 1, 2020 through December 31, 2021 for Care Stream Agency LLC (Care Stream). We also examined instances in which PDN services were billed with less than the four-hour required minimum.

Care Stream entered into an agreement with the Ohio Department of Medicaid (the Department) to provide services to Medicaid recipients and to adhere to the terms of the provider agreement, Ohio Revised Code, Ohio Administrative Code, and federal statutes and rules, including the duty to maintain all records necessary and in such form to fully disclose the extent of services provided and significant business transactions. Care Stream is responsible for its compliance with the specified requirements. Our responsibility is to express an opinion on Care Stream's compliance with the specified Medicaid requirements based on our examination.

The purpose of this examination was to determine whether Care Stream's claims for payment complied with Ohio Medicaid regulations. All rules and code sections relied upon in this report were those in effect during the examination period and may be different from those currently in effect.

We obtained service documentation from Care Stream for PDN services on 60 RDOS¹ which resulted in 85 services. The scope of the engagement was limited to the following:

- Compliance with Ohio Admin. Code § 5160-1-17.2 which specifies that a provider cannot be currently subject to sanction or otherwise prohibited from providing services. We tested nurses who rendered services in the sample and Care Stream administrators and found no non-compliance.
- Compliance with Ohio Admin. Code § 5160-12-02 (A) which specifies private duty nursing services are performed by either a registered nurse (RN) or a licensed practical nurse (LPN) at the direction of a registered nurse. We tested the 12 nurses who rendered services in the sample and found no non-compliance.

¹ RDOS is defined as all services for a given recipient on a specific date of service.

- Compliance with Ohio Admin. Code § 5160-1-17.2 which requires Medicaid providers to maintain all records necessary and in such form so as to fully disclose the extent of services provided and significant business transactions for a period of six years from receipt of payment or until any audit initiated within the six-year period is completed. We tested 85 services in the sample and found no non-compliance.
- Compliance with Ohio Admin. Code § 5160-12-03(B)(3)(b)² which requires a plan of care for recipients indicating the type of services to be provided to the recipient and the plan is required to be signed by the recipient's treating physician. We tested 85 services in the sample and found no non-compliance.

In addition, we examined 26 PDN services billed with less than the four-hour required minimum as specified in Ohio Admin. Code § 5160-12-02(A). Care Stream stated that in these instances the service was less than four hours in duration and the PDN code was billed instead of a home health nursing service code. Since there is no difference in the unit rate for PDN services and home health nursing services, we did not identify an improper payment for these errors.

Recommendation

Care Stream should develop and implement procedures to ensure that all billing practices fully comply with requirements contained in Ohio Medicaid rules. Care Stream should address the identified issues to ensure compliance with Medicaid rules and avoid future findings.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA). Those standards require that we plan and perform the examination to obtain reasonable assurance about whether Care Stream complied, in all material respects, with the specified requirements detailed below. We are required to be independent of Care Stream and to meet our ethical responsibilities, in accordance with the ethical requirements established by the AICPA related to our compliance examination.

An examination involves performing procedures to obtain evidence about whether Care Stream complied with the specified requirements. The nature, timing and extent of the procedures selected depend on our judgment, including an assessment of the risks of material noncompliance, whether due to fraud or error. We believe the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion. Our examination does not provide a legal determination on Care Stream's compliance with the specified requirements.

Internal Control over Compliance

Care Stream is responsible for establishing and maintaining effective internal control over compliance with the Medicaid requirements. We did not perform any test of the internal controls and we did not rely on the internal controls in determining our examination procedures. Accordingly, we do not express an opinion on the effectiveness of the Care Stream's internal control over compliance.

² This rule refers to the Medicare Benefit Policy Manual which requires that the plan of care be signed by the recipient's treating physician.

Opinion on Compliance

In our opinion, Care Stream complied, in all material respects, with the aforementioned requirements of PDN services for the period of January 1, 2020 through December 31, 2021. Our testing was limited to the specified Medicaid requirements detailed above. We did not test other requirements and, accordingly, we do not express an opinion on Care Stream's compliance with other requirements.

This report is intended solely for the information and use of Care Stream, the Department, and other regulatory and oversight bodies, and is not intended to be, and should not be used by anyone other than these specified parties.



Keith Faber
Auditor of State
Columbus, Ohio

March 13, 2023

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CARE STREAM AGENCY LLC

FRANKLIN 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 4/13/2023

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