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INDEPENDENT ACCOUNTANT'S REPORT ON APPLYING AGREED-UPON PROCEDURES

Ohio Department of Developmental Disabilities
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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, 2023 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, 2023 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, 2023, 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:

Targeted Case Management (TCM) and Service and Support Administration (SSA)

Statistics – Service and Support Administration (SSA)

1. We footed the County Board's Receivable Billing Reimbursable Summary and Detailed Units by Service 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 report with the Cost Report. We found variances greater than two percent of total units per row as reported in the Appendix.

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). We found no noncompliance with the documented activity or service documentation requirements greater than 10 percent.
3. We inquired with the County Board if it tracked SSA's general and administrative activities (general time units) as required by the Annual Summary of Units of Service – Service and Support Administration and SSA Unit and Cost Reporting sections of the *Guide to Preparing Income and Expenditure Reports for use by County Boards of Developmental Disabilities* (Cost Report Guide).

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Statistics – Service and Support Administration (Continued)

The County Board stated it did not track general time units; therefore, we calculated an estimate for general time units based on FTE and hours for the first line SSAs on the SSA Listing. We then calculated an initial and final SSA utilization rates of 35.11% and 36.17%; respectively, from the SSA Allowable, and SSA Unallowable 15 minute unit totals on the Annual Summary of Units of Service – Service and Support Administration form of the Cost Report and the estimated general time units.

We inquired with the County Board's management why the utilization rate was below 75%. We obtained an explanation that it monitors the productivity of caseload SSAs on a monthly basis. Caseload SSA's have a standard of 4 hours of case notes (TCM and non-billable notes) for each workday. For 2023 the average caseload SSA documented 4.5 hours per workday which is different than paid days. The County Board provided an estimate of 1,540 work hours for a normal year net of vacation, sick leave, holidays, and paid lunch which is 74% of the 2,080 paid hours per year.

TCM Paid Claims Testing

1. We selected 100 Targeted Case Management (TCM) recipient dates of service and compared the County Board's service documentation to the allowable/covered activities and documentation requirements listed in Ohio Admin. Code 5160-48-01 (D) and (F) and the Cost Report Instructions. 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	TCM Claims Result	Finding
TCM	117	Units billed by two SSA's at same time for the same activity	\$1,532.03
TCM	35	Units billed for Direct Services	\$ 449.08
			Total \$1,981.11

2. We compared the number of reimbursed TCM units from the Summary by Service Code report to the final units reported. We confirmed that total reimbursed units were less than final TCM units.

SSA Additional Procedures

1. We received an SSA listing from the County Board of all first line SSAs and first line SSA Supervisors and their respective salaries, benefits and full time equivalent (FTE) percentages. We compared the SSA listing to the TCM Allowable / Un-Allowable by Staff reports and found no variance. We noted the County Board had no SSAs listed that also worked in other departments and the County Board had already excluded Medicaid Administrative Claiming (MAC) costs from the salaries. We compared the first line SSA and first line SSA supervisor salary and benefit costs to the reported costs on the *Service and Support Administration form* of the Cost Report and found no variance.
2. We scanned the 2023 Salary report and inquired of management if there were any paid contingency-based bonuses for SSA utilization and found none.
3. We found 38 first line SSAs and eight first line SSA Supervisors listed on the SSA salary listing worksheet. We calculated 31.09 full-time equivalent (FTE) first line SSAs and 5.5 FTE first line SSAs. We calculated an initial first line SSA FTE to one SSA FTE supervisor ratio of 5.65. We calculated 30.09 final first line SSA FTEs and a final ratio of first line SSAs to first line SSA Supervisors of 5.47 after adjustments in the section titled SSA Payroll Expenditures.
4. We found 2,742 individuals served listed on DODD's Individual's served report. We calculated an initial ratio of 88.18 and a final ratio of 91.11 individuals served to one first line SSA FTE. We calculated an initial and final ratio of 499 individuals served to one first line SSA supervisor FTE.

SSA Payroll Expenditures

As part of the procedures under our Payroll Expenditures section, we found a portion of the salaries and benefit costs for an SSA and SSA Business manager positions without caseloads in the amount of \$11,181 that were related to payment authorization for waiver services and respite and was reclassified from the *Service and Support Administration form* to the *Direct Services and Adult Program forms* in accordance with the Cost Report Guide as reported in the Appendix.

SSA Non-Payroll Expenditures

As part of the procedures under our Non-Payroll Expenditures section, we reclassified \$1,800 in psychological evaluation costs from the *Service and Support Administration form* to the *Psychological Services form* in accordance with the Cost Report Instructions as reported in the Appendix.

TCM Unit Rate Procedure

1. We calculated a TCM unit rate of \$11.83 per 15 minute unit from final SSA expenditures on the *Service and Support Administration form* and from final SSA Allowable units, SSA Unallowable units on the *Annual Summary of Units of Service – Service and Support Administration form* and estimated general time units. We compared the calculated TCM unit rate to the actual TCM unit rate of \$38.49 provided by DODD. We found the calculated TCM rate was \$5 less than the actual TCM unit rate and we inquired with County Board's management regarding the variance. We obtained the same explanation provided under the Statistics – Service and Support Administration section, procedure #3.
2. We calculated a 15 minute TCM unit rate of \$12.73 per 15 minute unit from the SSA Listing of first line SSA and first line SSA supervisor salaries, benefits and hours prepared by the County Board, including a calculation estimate of 15% for overhead costs. We compared the calculated TCM unit rate to the actual TCM unit rate of \$38.49 provided by DODD.

We found the calculated TCM rate was \$5 less than the actual TCM unit rate and we inquired with County Board's management regarding the variance. We obtained the same explanation provided under the Statistics – Service and Support Administration section, procedure #3.

Allocation Statistics - Square Footage

We compared the allocation methodology used in the Square Footage Summary for the waiver services to the period of service delivery. We confirmed the allocation method for facility based services square footage was consistent with the period of service delivery.

Allocation Statistics - Attendance

1. We footed the Facility Day Services Summary, Active Treatment Attendance, and Day Services Attendance Summary. There were no computational errors.

We compared the attendance reports to the reported number of individuals served and days of attendance to the Cost Report Guide. We found no variances exceeding two percent by row.

2. We traced the total attendance days for five individuals for each service type for two months from the daily attendance documentation and attendance reports to the Cost Report. There were no differences.

Allocation Statistics - Transportation

We scanned the Summary by Service Code report for the period January 1, 2023 through December 31, 2023 and found no paid waiver transportation services.

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Adult Program Paid Claims Testing

1. We confirmed that the County Board only provided adult services and we selected 25 per year among all waiver service codes from the Summary by Service Code report.

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 and the Cost Report Instructions. We found no instances of non-compliance.

2. We scanned the Summary by Service Code report for the period January 1, 2023 through December 31, 2023 and found no paid waiver transportation services.

Non-Payroll Expenditures

1. We traced non-payroll expenditures on the Non-Wage Benefit report to the *Indirect Costs Allocation, Service and Support Administration* and *Adult Programs* forms. We found no variances exceeding \$500.
2. We selected 60 disbursements from the service contracts and other expenses on the Posted General Ledger Transactions report in cost categories that contributed to Medicaid rates. We compared the County Board's supporting documentation to the Cost Report and 2 C.F.R. §§ 200.420-475. There were variances greater than two percent and non-federal reimbursable costs. For any errors, we scanned the Posted General Ledger Transactions report for other like errors in the same cost center. We found additional similar errors and totaled all identified errors as reported in the Appendix.
3. We confirmed that the County Board maintained Revenue and Expense reconciliations for one month in each quarter showing it performed monthly income and expense reconciliations in accordance with Ohio Admin. Code 5123-4-01(O)(2).
4. We compared final adult program costs and professional services costs with adult attendance and professional statistics to determine if there was a corresponding program cost reported for reported statistics and square footage.

We found 51 individuals served reported under the enclave cost category on the *Professional Services - Psychological Services form* without corresponding costs. We inquired with the County Board and confirmed this program was no longer active in 2023 and we removed the individuals served as reported in the Appendix.

We compared adult attendance and professional services statistics and square footage to final professional service and adult program costs to determine if there were statistics and square footage for each corresponding program cost category. We found facility based service costs on the *Professional Services - Social Work/Counseling form* without corresponding adult square footage on the *Square Footage Allocation form*. We inquired with the County Board and confirmed square footage should be reclassified as reported in the Appendix.

We also found costs on the *Professional Services - Speech/Audiology form* without corresponding statistics. We inquired with the County Board and obtained an explanation that the costs were for interpretive services; therefore, we reclassified these costs in accordance with the Cost Report Guide as reported in the Appendix.

Payroll Expenditures

1. We compared the salaries and benefit costs on the Salary report to the amounts reported on the Indirect Cost, Program Supervision, Service and Support Administration and Adult Programs forms. There were no variances exceeding \$500.

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Payroll Expenditures (Continued)

2. We selected 33 employees from the Salary report in cost categories that contribute to Medicaid rates. For the employees selected, we compared the organizational chart, Salary and TCM Allowable / Un-Allowable by Staff reports, job descriptions, and basis for allocation to the worksheet in which each employee's salary and benefit costs were allocated in accordance with 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 for the Random Moment Time Study (RMTS) participants for the second quarter from the Burdened Salary report and benefit worksheets 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". We found no variances.

Unit Rate

For the Facility Based Services (Acuity A, B, and C) and targeted case management 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.

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
Ohio Auditor of State



Tiffany L Ridenbaugh, CPA, CFE, CGFM
Chief Deputy Auditor

September 9, 2025

Appendix

Lake County Board of Developmental Disabilities

2023 Cost Report Adjustments

	Reported Amount	Correction	Corrected Amount	Explanation of Correction
Square Footage Allocation				
Social Work/Counseling, Adult	-	6	6	To reclassify adult square footage
Social Work/Counseling, Child	55	(6)	49	To reclassify adult square footage
Annual Summary of Units of Service - Service and Support Administration				
TCM Units, CB Activity	88,958	(152)	88,806	To remove unallowable units from paid claims testing
Other SSA Allowable Units, CB Activity	1,871	(109)	1,762	To correctly report SSA units
SSA Unallowable Units, CB Activity	1,334	152	1,486	To remove unallowable units from paid claims testing
Indirect Cost Allocation				
Other Expenses, Non-Federal Reimbursable	\$ 688,548	\$ 762		To reclassify employee recruitment promotional items
		\$ 2,844		To reclassify insurance costs without support for allocation method
		\$ 1,500	\$ 693,654	To reclassify conference sponsorship costs
Other Expenses, Gen Expense All Program	\$ 966,604	\$ (762)		To reclassify employee recruitment promotional items
		\$ (2,844)		To reclassify insurance costs without support for allocation method
		\$ (1,500)	\$ 961,498	To reclassify conference sponsorship costs
Program Supervision				
Salaries, Facility Based Services				To reclassify first level supervision salaries for the Agency Support Director
Employee Benefits, Facility Based Services	\$ 145,325	\$ (106,317)	\$ 39,008	To reclassify first level supervision benefits for the Agency Support Director
	\$ 51,618	\$ (37,763)	\$ 13,855	
Direct Services				
Salaries, Unassign Children Program	\$ 121,876	\$ 796		To reclassify salary for SSA without a caseload that works on PAWS and waiver support
		\$ 276	\$ 122,948	To reclassify portion of the SSA Business Manager salary related to PAWS and respite
Employee Benefits, Unassign Children Program	\$ 43,289	\$ 283		To reclassify salary for SSA without a caseload that works on PAWS and waiver support
		\$ 98	\$ 43,670	To reclassify portion of SSA Business Manager benefits related to PAWS and respite

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Lake County Board of Developmental Disabilities

2023 Cost Report Adjustments

	Reported Amount	Correction	Corrected Amount	Explanation of Correction
Direct Services (Continued)				
Other Expenses, Community Residential	\$ 391,042	\$ 130	\$ 391,172	To reclassify ASL interpretive services
Professional Services - Psychology Services				
Service Contracts, Community Residential	\$ 294	\$ 1,800	\$ 2,094	To reclassify psychological evaluation costs
# of individuals served, Enclave	51	(51)	0	To remove individuals served for program without costs
# of individuals served, Community Residential	-	1	1	To add an individual served for psychological evaluation costs
			2	To add an individual served for psychological evaluation costs
Professional Services - Speech Services				
Other Expenses, Community Residential	\$ 130	\$ (130)	\$ -	To reclassify ASL interpretive services
Services and Support Admin				
Salaries, Service & Support Admin Costs	\$ 2,120,022	\$ (6,126)	\$ 2,111,772	To reclassify salary for SSA without a caseload that works on PAWS and waiver support
		\$ (303)		To reclassify portion of SSA Business Manager salary related respite
		\$ (1,821)	\$ 2,111,772	To reclassify portion of SSA Business Manager salary related to PAWS
Employee Benefits, Service & Support Admin Costs	\$ 753,013	\$ (2,176)	\$ -	To reclassify benefits for SSA without a caseload that works on PAWS and waiver support
		\$ (108)		To reclassify portion of SSA Business Manager benefits related to respite
		\$ (647)	\$ 750,082	To reclassify portion of SSA Business Manager benefits related to PAWS
Service Contracts, Service & Support Admin Costs	\$ 1,800	\$ (1,800)	\$ -	To reclassify psychological evaluation costs
Adult Program				
Salaries, Facility Based Services	\$ 2,180,054	\$ 106,317	\$ -	To reclassify first level supervision salaries for the Agency Support Director
		\$ 5,330		To reclassify salary for SSA without a caseload that works on PAWS and waiver support
		\$ 1,848	\$ 2,293,549	To reclassify portion of the SSA Business Manager salary related to PAWS and respite

Appendix**Lake County Board of Developmental Disabilities****2023 Cost Report Adjustments**

Reported Amount	Correction	Corrected Amount	Explanation of Correction
Adult Program (Continued)			
Employee Benefits, Facility Based Services			To reclassify first level supervision benefits for the Agency Support Director
\$ 774,335	\$ 37,763		To reclassify benefits for SSA without a caseload that works on PAWS and waiver support
	\$ 1,893		To reclassify portion of the SSA Business Manager benefits related
	\$ 657	\$ 814,648	to PAWS and Respite

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 10/14/2025

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This report is a matter of public record and is available online at
www.ohioauditor.gov