



OHIO AUDITOR OF STATE
KEITH FABER





Medicaid Contract Audit
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**INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE WITH REQUIREMENTS OF THE
MEDICAID PROGRAM APPLICABLE TO SELECT WAIVER PERSONAL CARE AIDE SERVICES**

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

RE: Columbus Global Family Care, LLC
Ohio Medicaid Number: 2550690

National Provider Identifier: 1598967549

We examined compliance with specified Medicaid requirements for select waiver personal care aide services during the period of July 1, 2021 through June 30, 2023 for Columbus Global Family Care, LLC (Columbus Global). We tested the following payments¹:

- All services for four recipients residing at the same address for one selected week of service (T1019);
- All services billed 270 days or more after the date of service (T1019);
- All recipient dates of service (RDOS)² with 50 or more units (PT624 and T1019);
- A sample of waiver personal care aide services (T1019); and
- A sample of PASSPORT waiver personal care aide services (PT624).

Columbus Global 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 so as to fully disclose the extent of services provided and significant business transactions. Management of Columbus Global is responsible for its compliance with the specified requirements. Our responsibility is to express an opinion on Columbus Global's compliance with the specified Medicaid requirements based on our examination.

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 Columbus Global complied, in all material respects, with the specified requirements referenced above. We are required to be independent of Columbus Global 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 Columbus Global 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 Columbus Global's compliance with the specified requirements.

¹ Procedure codes tested include waiver personal care aide (T1019) and preadmission screening system providing options and resources (PASSPORT) waiver personal care aide (PT624) services.

² A RDOS is defined as all services for a recipient on a specified date of service

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The purpose of this examination was to determine whether Columbus Global's claims for payment complied with Ohio Medicaid regulations. Please note that 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.

Results

Provider Qualifications

Per Ohio Admin. Code 5160-1-17.2(H), in signing the Medicaid provider agreement, a provider agrees that the individual practitioner or employee of the company is not currently subject to sanction under Medicare, Medicaid, or Title XX; or, is otherwise prohibited from providing services to Medicaid beneficiaries.

We identified 29 practitioners in the service documentation for the selected services and compared their names, and administrators, to the Office of Inspector General exclusion database and the Department's exclusion/suspension list and found no matches.

Service Documentation

For waiver personal care services, the provider must maintain all required documentation including, but not limited to, documentation of activities provided and arrival and departure times in accordance with Ohio Admin. Code 5160-31-05(B), 173-39-02.11, and 5160-58-04(C).

We obtained service documentation from Columbus Global and compared it to the required elements. We also compared units billed to documented duration.

All Services for Four Recipients Residing at the Same Address for One Selected Week of Service

The 28 services examined contained one instance totaling \$39.36 in which the start time of one service was documented as prior to the end time of a different service performed by the same aide and the group modifier was not indicated.

Additionally, there were several instances identified where the services appeared to be underbilled when compared to the service documentation.

All Services Billed 270 days or More After the Date of Service

The 26 services examined were compliant with the service documentation requirements tested.

All RDOS with 50 or More Units

The 11 services examined contained two instances totaling \$222.72 in which the units billed were greater than the documented duration.

Waiver Personal Care Aide Services Sample

The 61 services examined were compliant with the service documentation requirements tested.

PASSPORT Waiver Personal Care Aide Services Sample

The 60 services examined were compliant with the service documentation requirements tested.

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Recommendation

Columbus Global should implement a quality review process to ensure that only units supported by the documentation are billed. Columbus Global should address the identified issue to ensure compliance with Medicaid rules and avoid future findings.

Internal Control over Compliance

Columbus Global 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 Columbus Global's internal control over compliance.

Opinion on Compliance

In our opinion, Columbus Global complied, in all material respects, with the aforementioned requirements for the select waiver personal care aide payments for the period of July 1, 2021 through June 30, 2023. 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 Columbus Global's compliance with other requirements.

This report is intended solely for the information and use of Columbus Global, 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. Columbus Global submitted an official response to the results of this examination which is presented in the **Appendix**. We did not examine Columbus Global's response, and accordingly, we express no opinion on it.



Keith Faber
Auditor of State
Columbus, Ohio

May 6, 2025

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APPENDIX



Columbus Global Family Care, LLC
6100 Channingway Blvd, Suite 402, Columbus, OH 43232
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05/06/2025

Hello Cherie,

Please accept this letter as a response to Medicaid compliance examination report. In order to improve implementation of a quality review process to ensure that only units supported by the documentation are billed and to prevent some billing errors in the future, Columbus Global Family Care (CGFCLLC) must assign **at least two office workers** to verify the following technological details related to the billing process:

1. Setting up a new clients' information in Sandata system.
2. Checking up authorized Service Plans and time-sheets (according to the delivered services) written by Personal Care Aides (PCAs) and signed by them and by clients.
3. Making operative control of Sandata information regarding the PCAs' performed visits to the clients.
4. Submitting all information about performed services of Aetna and Molina waiver programs to DYSERV billing company. The billing company verifies received billing information and exports it to Aetna and Molina systems accordingly.
5. Entering billing data for PASSPORT clients directly to website of this waiver program.
6. Checking up Remittance Advices of PASSPORT, Aetna and Molina containing information of services authorization, payments for delivered services including dates, duration of services, amounts paid for each service session, etc.

We have to remind all our PCAs about necessity to pay **additional attention** to some processes performing by them:

1. Services delivering must be done according to the Plans of Care.
2. Time-sheets must contain all information about delivered services.
3. PCAs have to do Clock In and Clock Out, enter correct information to Sandata system for each service session (codes of clients and PCA, code of service, etc.) according to the delivered services and to the clients' Plans of Care.

CGFCLLC staff is responsible for establishing and maintaining an effective internal control over compliance with the requirements of Medicaid and Medicaid Waiver Programs.

Sincerely,

Mark Sokolovski
President
614-989-2970

Columbus Global Family Care, LLC is an Equal Opportunity Employer

OHIO AUDITOR OF STATE KEITH FABER



COLUMBUS GLOBAL FAMILY CARE, 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 5/20/2025

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