



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, 2021, 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, 2021, 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, 2021, 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:

### 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 2021.

### Allocation Statistics - Attendance

1. We footed the SE Case Notes, Enclave Days of Attendance and Facility Day Service Attendance Service Summary and SE units report 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. We identified no variances.

We scanned the attendance reports from January 1 to August 31, 2021, and found days that were not reported at acuity B or C as identified in the Appendix.

2. We traced the total attendance days for five individuals for each service type for one month during January to August and one month during September to December from the daily attendance documentation and attendance acuity reports to the Cost Report. There were differences as reported in the Appendix.

**Allocation Statistics - Transportation**

1. We footed the Transportation Trips By Age Group Summary for accuracy. There were no computational errors.

We compared the total number of adult one-way trips from the transportation report to the Cost Report. There were no variances greater than two percent of total adult program trips.

2. We traced the number of trips for 10 adults for one month from the daily service documentation to the compilation of trips. There were no variances.
3. There were no cost of bus tokens/cabs reported and we inspected the Expense Detail report for any omitted costs. We found none.

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

1. We footed the County Board's Consumer Detail by TCM Group GK report 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 no variances.

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). There were no variances of total units tested. We found no noncompliance with the documentation elements.
3. We confirmed the error rate in the Other SSA allowable units tested was below the 25 percent threshold.

**Paid Claims**

1. We confirmed that the County Board provided both adult services and non-medical transportation (NMT) and we selected 50 per year among all service codes. 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 in effect at the time-of-service delivery. We found instances of non-compliance in AVY - Vocational Habilitation Restart - 15-minute unit as described below. We calculated a recoverable finding in the amount of \$37.84; however, we reported no corresponding unit adjustments.

Service Code	Units	Paid Claims Results	Finding
AVY	18	Units billed in excess of actual duration of service delivery	\$37.84
		<b>Total</b>	<b>\$37.84</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 Summary by Service Code to the final units reported. We confirmed that total reimbursed units were less than final TCM units.
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.

**Paid Claims (Continued)**

5. We confirmed through inquiry with the County Board that it had no commercial transportation contracts during calendar year 2021.

**Non-Payroll Expenditures**

1. We traced the Expense Detail reports to the Cost Report forms for indirect costs, program supervision, transportation services, SSA and adult programs. We found no variances.
2. We selected 60 disbursements from the service contracts and other expenses from cost categories that contributed to the Medicaid rates. We compared the County Board's supporting documentation to the Cost Report and 2 CFR 200.420 - .475. There were variances greater than two percent and non-federal reimbursable costs. For any errors, we scanned the Expense Detail reports for other like errors in the same cost center. We found additional similar errors. We totaled all identified errors as reported in the Appendix.
3. We confirmed that the County Board maintained documentation for one month in each quarter in accordance with Ohio Admin. Code § 5123-4-01(N)(1).
4. 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, professional service costs or square footage without final attendance statistics.

**Payroll**

1. We compared the salaries and benefit costs on the Summary Salary Allocation worksheets to the Expense Detail reports and the Detail reports to the amounts reported on the worksheets/forms for indirect costs, program supervision, adult transportation, SSA and adult programs. There were no variances.
2. We selected 40 employees, including the SSA Director and Behavior Analysts. For the employees selected, we compared the organizational chart, IHAC and ABRA and Expense Detail reports, Case Notes Summary of Units Billed By Case Manager, and 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 fourth quarter from the Check/Direct Deposit Register to the Quarterly Payroll and Rollup report and from the Quarterly payroll report to the salaries and benefits submitted on the Cost by Individual Report.

We confirmed that the actual salaries and benefits totals agreed to the MAC reimbursed salaries and benefits.

**Medicaid Administrative Claiming (Continued)**

2. 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" sections for 11 RMTS observed moments selected by the Department. We found no variances.

**Unit Rate**

For unit rates identified by the Department on the Comprehensive Cost Report Rate sheet, we used the Cost Report notes and any Department desk review notations and inquired with County Board management to identify any omissions or misreporting of costs or statistics, new contracts, and changes due to privatization which impact the unit rates.

The County Board identified that the revenue offset for community employment was incorrectly posted on the A1 Adult form to Enclave in lieu of Community Employment. We obtained supporting documentation for the reclassification of the offset from Enclave to Community Employment as reported in the Appendix. The County Board also commented that the pandemic affected the unit rates for attendance.

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  
Auditor of State  
Columbus, Ohio

August 2, 2023

**Appendix**  
**Lorain County Board of Developmental Disabilities**  
**2021 Cost Report Adjustments**

	<b>Reported Amount</b>	<b>Correction</b>	<b>Corrected Amount</b>	<b>Explanation of Correction</b>
<b>Attendance Statistics</b>				
<b>Total Days of Attendance by Acuity</b>				
A, Facility Based Services (Non-Title XX Only)	22,961	(14,152)		To reclassify to acuity level B for 1/1/21 - 8/31/21
		(45)		To reclassify to acuity level B for change in acuity level
		(31)	8,733	To reclassify to acuity level B for change in acuity level
B, Facility Based Services (Non-Title XX Only)	2,060	14,152		To reclassify to acuity level B for 1/1/21 - 8/31/21
		45		To reclassify to acuity level B for change in acuity level
		31	16,288	To reclassify to acuity level B for change in acuity level
C, Facility Based Services (Non-Title XX Only)	3,992	1	3,993	To match attendance report
A, Supported Emp.-Enclave (Non-Title XX Only)	6,545	1	6,546	To match attendance report
<b>Indirect Cost Allocation</b>				
Salaries, Gen Expense All Program	\$ 1,037,475	\$ (4,402)	\$ 1,033,073	To reclassify Community Education & Volunteer Director salary to Direct Services
Employee Benefits, Gen Expense All Program	\$ 870,846	\$ (680)	\$ 870,166	To reclassify Community Education & Volunteer Director salary to Direct Services
Service Contracts, Gen Expense All Program	\$ 107,428	\$ (12,120)		To reclassify bed bug treatment costs to community residential
		\$ (15,512)		To reclassify legal service retention costs without detailed invoice of services provided
		\$ (15,512)	\$ 64,284	To reclassify legal service retention costs without detailed invoice of services provided
Other Expenses, Non-Federal Reimbursable	\$ 4,271	\$ 400		To reclassify volunteer, employee and board president service and recognition gifts
		\$ 1,500		To reclassify contribution to sponsor conference
		\$ 167		To reclassify birthday cards to employees
		\$ 6,000		To reclassify contribution to OPRA recruitment grant
		\$ 15,512		To reclassify legal service retention costs without detailed invoice of services provided
		\$ 15,512		To reclassify legal service retention costs without detailed invoice of services provided
		\$ 659	\$ 44,021	To reclassify employee gifts

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	<b>Reported Amount</b>	<b>Correction</b>	<b>Corrected Amount</b>	<b>Explanation of Correction</b>
<b>Indirect Cost Allocation, Continued:</b>				
Other Expenses, Gen Expense All Program	\$ 204,115	\$ (400)		To reclassify volunteer, employee and board president service and recognition gifts
		\$ (1,500)		To reclassify contribution to sponsor conference
		\$ (167)		To reclassify birthday cards to employees
		\$ (6,000)		To reclassify contribution to OPRA recruitment grant
		\$ (659)	\$ 195,389	To reclassify employee gifts
<b>Direct Services</b>				
Salaries, Community Residential		\$ 59,099	\$ 59,099	To reclassify special olympics portion of Hab Manager salary to Direct Services
Salaries, Non-Federal Reimbursable	\$ 16,219	\$ 251		To reclassify MUI and promotional portion of Adult Services Intermittent Supervisor salary
		\$ 4,402	\$ 20,872	To reclassify Community Education & Volunteer Director salary to Direct Services
Employee Benefits, Community Residential		\$ 29,390	\$ 29,390	To reclassify special olympics portion of Hab Manager benefits to Direct Services
Employee Benefits, Non-Federal Reimbursable	\$ 8,295	\$ 39		To reclassify MUI and promotional portion of Adult Services Intermittent Supervisor benefits
		\$ 680	\$ 9,014	To reclassify Community Education & Volunteer Director salary to Direct Services
Service Contracts, Community Residential	\$ 343,231	\$ 12,120	\$ 355,351	To reclassify bed bug treatment costs to community residential
Other Expenses, Community Residential	\$ 100,144	\$ 2,939		To reclassify homemaker personal care expenses
		\$ 8,140	\$ 111,223	To reclassify self advocacy community event expenses to Direct Services
Other Expenses, Non-Federal Reimbursable	\$ 799	\$ 4,801	\$ 5,600	To reclassify event promotional items, gifts, photobooth and recap video costs
<b>Services and Support Admin</b>				
Other Expenses, Service & Support Admin Costs	\$ 104,271	\$ (2,939)		To reclassify homemaker personal care expenses
		\$ (4,801)		To reclassify event promotional items, gifts, photobooth and recap video costs
		\$ (8,140)	\$ 88,391	To reclassify self advocacy community event expenses to Direct Services



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	<b>Reported Amount</b>	<b>Correction</b>	<b>Corrected Amount</b>	<b>Explanation of Correction</b>
<b>Adult Program</b>				
Salaries, Facility Based Services	\$ 4,041,799	\$ (59,099)		To reclassify special olympics portion of Hab Manager salary to Direct Services
		\$ (251)	\$ 3,982,448	To reclassify MUI and promotional portion of Adult Services Intermittent Supervisor salary
Employee Benefits, Facility Based Services	\$ 2,157,919	\$ (29,390)		To reclassify special olympics portion of Hab Manager benefits to Direct Services
		\$ (39)	\$ 2,128,490	To reclassify MUI and promotional portion of Adult Services Intermittent Supervisor benefits
<b>A1Adult</b>				
Enclave, Less Revenue	41,049	(41,049)	-	To reclassify OOD revenue
Community Employment, Less Revenue	-	41,049	41,049	To reclassify OOD revenue

# 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 8/22/2023**

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