



OHIO AUDITOR OF STATE  
**KEITH FABER**





# OHIO AUDITOR OF STATE KEITH FABER



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## Independent Accountants' Report on Applying Agreed-Up Procedures

Ohio Department of Medicaid  
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We have performed the procedures enumerated below on the Buckeye Hills Regional Council's Medicaid Waiver Cost Report (Cost Report) and certain compliance requirements related to contract monitoring for the year ended June 30, 2022 included in the information provided to us by the management of the Buckeye Hills Regional Council. The Buckeye Hills Regional Council is responsible for completion of the Cost Report and contract monitoring as required by the Agreement between the Ohio Department of Medicaid (ODM) and the Ohio Department of Aging (ODA) and the PASSPORT Administrative Agency (PAA).

The ODM and the ODA have agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of evaluating the Cost Report. 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 this report and may not meet the needs of all users of this 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 parties specified in the report. 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:

### **Revenue**

1. We agreed the revenue on the Liability Cash Journal and Posted General Ledger Transactions report to *Final Page A* and agreed the Transfer-In amount to the prior year Cost Report. There were no variances.
2. We agreed the client liability amounts on the Statement of Revenues and Expenditures, Liability Cash Journal, and Posted General Ledger Transactions report to *Final C Page* and we agreed the beginning receivable amount to the prior year Cost Report. There were no variances exceeding \$1,000.

### **Square Footage**

We compared the square footage on the Space by Job Function Category report to the square footage on the Rent Allocation worksheet and compared the allocation percentages on the Rent worksheet to the Expense by Cost Center worksheet used to allocate costs to each waiver worksheet. There were no square footage variances exceeding 10 percent.

### **Trial Balance and Non-Payroll Expenses**

1. We agreed the disbursements on the Standard General Ledger to the Expense by Cost Center worksheet and the Cost Center worksheet and Statement of Revenues and Expenditures to *Worksheet 1, Total Allowable Expenses by Line Item* for each waiver. There were no variances.

### **Trial Balance and Non-Payroll Expenses (Continued)**

We compared total PASSPORT Information Management System (PIMS) costs to total *Worksheet 2, Waiver Services Expenses Detail* and calculated the variance. The calculated variance exceeded one half percent of total PIMS costs and we confirmed the Cost Report contained no explanation of the variance.

2. For each waiver worksheet, we calculated five percent of the total of all non-payroll cost report accounts and identified any cost report accounts with a total that exceeds the five percent threshold. We scanned the Posted General Ledger Transactions report and Standard General Ledgers for potential unallowable or improperly allocated costs per 2 CFR 200 Subpart E that impact the identified account codes and selected 60 disbursements including items identified in the scan.

We obtained the invoice and/or contract for each selected expense and performed the following:

- We confirmed documentation for the full cost was maintained as required by PAA Medicaid Waiver Cost Report Instructions (Cost Report Instructions) and 2 CFR 200.403(g).
- We footed the invoice/documentation for accuracy and found no computational differences resulting in decreased costs on *Worksheet 1*.
- For invoices with a corresponding contract, we compared the invoice rate to the contracted rate and found no differences resulting in decreased costs.
- We compared documentation for each expense to the unallowable categories listed in 2 CFR part 200.400 - .475. There were variances for non-federal reimbursable costs. For any errors found, we scanned the corresponding invoice and found no additional similar errors. We reported all errors in the Appendix.
- We compared the documented non-payroll expense and type of expense to the worksheet and account classification on the Cost Report and with the Cost Report Instructions and the PAA's Cost Allocation Plan. There were account reclassifications between cost report accounts exceeding \$1,000 per row. For any errors found, we scanned the corresponding invoice to identify any additional similar misclassifications and found additional similar errors. We totaled and reported all reclassifications in the Appendix.
- We documented the name and type of expense and if the purpose was unclear, inquired with PAA to confirm if the business purpose of the expense benefitted the PAA's Medicaid Waiver Programs in accordance with 2 CFR part 200.405 and CMS Publication 15-1 § 2302.4 and did not benefit other programs. There were variances for costs that did not benefit the PAA's Medicaid waiver programs. For any errors found, we scanned the corresponding invoice and found no additional similar errors. We reported all variances in the Appendix.
- We compared the documented cost and type of expense to the PAA's Depreciation/ Capitalization Policy to confirm if the expense was not a capital asset and found none.
- We compared the cost methodology and allocation statistics for each expense to the allowable methods per the Cost Report Instructions and CMS 15-1 § 2302.8. There were no differences.
- We confirmed each amount was recorded on the accrual basis, in accordance with the Cost Report Instructions, by agreeing the date/time period of the invoice/documentation to the Cost Reporting period.

## Payroll

1. We agreed salaries and benefits on the Statement of Revenues and Expenditures to the Expense by Cost Center worksheet and the Cost Center worksheet to *Worksheet 1* for each waiver. There were no variances.

We compared the first and last pay periods on the Pre-Transfer Register to the Posted General Ledger Transactions report to confirm employee payroll expenses were reported on the accrual basis. There were no variances.

2. We obtained the Employee Roster and counted the total number of employees reported on *Worksheet 1*. We selected 10 employees reported on *Worksheet 1* and performed the following procedures on each selected employee:
  - We compared the job descriptions, Payroll reports, and organizational chart to the unallowable categories listed in 2 CFR part 200.400 - .475. We confirmed the cost benefitted the Medicaid program in accordance with 2 CFR part 200.405 and CMS Publication 15-1 § 2302.4 and did not benefit other programs. There were no variances for any unallowable costs or any cost that did not benefit the Medicaid program.
  - We compared the Posted General Ledger Transaction and Payroll reports for one month to the Statement of Revenues and Expenditures and the Fringe Benefit by Employee by Project report and then traced the Statement of Revenues and Expenditures to the Expenses by Cost Center worksheet and to the account classification on the Cost Report, the Cost Report Instructions and the PAA's Cost Allocation Plan. There were no variances which resulted in reclassifications between cost report accounts.
  - We compared the cost methodology and allocation statistics for the same monthly payroll expenses for each employee to the allowable methods per the Cost Report Instructions and CMS 15-1 § 2302.8. There were no differences.

## Property

1. We agreed capital costs on the Posted General Ledger Transaction report and the Summary Asset Ledger to the Expense by Cost Center for Passport worksheet and the Cost Center worksheet to *Worksheet 1*. There were no differences.
2. We compared the SFY 2022 Summary Asset Ledger to the SFY 2021 Summary Asset Ledger for changes in the depreciation amounts for assets purchased prior to SFY 2022, depreciation taken on the same asset more than once, assets that have been fully depreciated in prior years or depreciation which was not in compliance with the Cost Report Instructions. There were no variances.
3. We scanned the Summary of Fixed Assets, Posted General Ledger Transactions report and Standard General Ledgers for any loss on *Worksheet 1* that was not in accordance with CMS Publication 15-1, Chapter 1, § 104.10(E) and found none.
4. We scanned the Posted General Ledger Transactions report and Standard General Ledgers for items purchased during the reporting period that met the capitalization criteria and traced them to the Depreciation Schedule. We identified a capital asset that was included on the Depreciation Schedule and also on the Standard General Ledger and, as a result, was duplicately reported on the Cost Report. We removed the cost of the capital asset as reported in the Appendix.

**Contract Monitoring**

We obtained the PAA's written procedures and supporting documentation related to performing provider oversight processes in accordance with Section III(A)(3)(e)(ii) in its Three Party Agreement with ODM and ODA. We selected five providers for each type of provider oversight, including five pre-certification review, five structural compliance reviews and five event based reviews and compared supporting documentation to the written procedure requirements. There were no differences.

We 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 PAA's Cost Report and compliance with contract monitoring requirements. 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 PAA 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

February 7, 2024

Appendix  
 Buckeye Hills Regional Council  
 Independent Accountants' Report on  
 Applying Agreed Upon Procedures

SUMMARY OF COST AND EXPENSE ADJUSTMENTS (Corrections)

Program: Passport

COST REPORT									
Finding Number	Worksheet	Line	Account	Cost Center	Type of Finding	Specific Compliance Citation	Reported Costs	Adjustment	Adjusted Cost
1	1	1	Salaries	General Admin.	To reclassify indirect salaries	Cost Report Instructions	\$ 89,922	\$ 1,005	\$ 90,927
1	1	1	Salaries	Screening	To reclassify indirect salaries	Cost Report Instructions	\$ 76,170	\$ 881	\$ 77,050
1	1	1	Salaries	Assessment	To reclassify indirect salaries	Cost Report Instructions	\$ 316,442	\$ 3,900	\$ 320,342
1	1	1	Salaries	Case Management	To reclassify indirect salaries	Cost Report Instructions	\$ 892,311	\$ 10,595	\$ 902,906
1	1	1	Salaries	Provider Relations	To reclassify indirect salaries	Cost Report Instructions	\$ 150,906	\$ 1,788	\$ 152,694
2	1	5	Equipment < \$5000	General Admin.	To reclassify computer equipment	Cost Report Instructions	\$ -	\$ 762	
4	1	5	Equipment < \$5000	General Admin.	To reclassify computer equipment	Cost Report Instructions		\$ 832	
6	1	5	Equipment < \$5000	General Admin.	To reclassify minor equipment and furniture	Cost Report Instructions		\$ 141	
7	1	5	Equipment < \$5000	General Admin.	To reclassify minor equipment	Cost Report Instructions		\$ 17	\$ 1,752
2	1	5	Equipment < \$5000	Screening	To reclassify computer equipment	Cost Report Instructions	\$ -	\$ 668	
4	1	5	Equipment < \$5000	Screening	To reclassify computer equipment	Cost Report Instructions		\$ 729	
6	1	5	Equipment < \$5000	Screening	To reclassify minor equipment and furniture	Cost Report Instructions		\$ 124	
7	1	5	Equipment < \$5000	Screening	To reclassify minor equipment	Cost Report Instructions		\$ 15	\$ 1,536
2	1	5	Equipment < \$5000	Assessment	To reclassify computer equipment	Cost Report Instructions	\$ -	\$ 2,957	
4	1	5	Equipment < \$5000	Assessment	To reclassify computer equipment	Cost Report Instructions		\$ 3,229	
6	1	5	Equipment < \$5000	Assessment	To reclassify minor equipment and furniture	Cost Report Instructions		\$ 549	
7	1	5	Equipment < \$5000	Assessment	To reclassify minor equipment	Cost Report Instructions		\$ 67	\$ 6,802
2	1	5	Equipment < \$5000	Case Management	To reclassify computer equipment	Cost Report Instructions	\$ -	\$ 34,272	
4	1	5	Equipment < \$5000	Case Management	To reclassify computer equipment	Cost Report Instructions		\$ 8,774	
6	1	5	Equipment < \$5000	Case Management	To reclassify minor equipment and furniture	Cost Report Instructions		\$ 1,491	
7	1	5	Equipment < \$5000	Case Management	To reclassify minor equipment	Cost Report Instructions		\$ 182	\$ 44,718
2	1	5	Equipment < \$5000	Provider Relations	To reclassify computer equipment	Cost Report Instructions	\$ -	\$ 1,356	
4	1	5	Equipment < \$5000	Provider Relations	To reclassify computer equipment	Cost Report Instructions		\$ 1,481	
6	1	5	Equipment < \$5000	Provider Relations	To reclassify minor equipment and furniture	Cost Report Instructions		\$ 252	
7	1	5	Equipment < \$5000	Provider Relations	To reclassify minor equipment	Cost Report Instructions		\$ 31	\$ 3,119

**SUMMARY OF COST AND EXPENSE ADJUSTMENTS (Continued)**

Program: Passport

COST REPORT									
Finding Number	Worksheet	Line	Account	Cost Center	Type of Finding	Specific Compliance Citation	Reported Costs	Adjustment	Adjusted Cost
2	1	7	Supplies	General Admin.	To reclassify computer equipment	Cost Report Instructions	\$ 1,862	\$ (762)	
6	1	7	Supplies	General Admin.	To reclassify minor equipment and furniture	Cost Report Instructions		\$ (141)	\$ 959
2	1	7	Supplies	Screening	To reclassify computer equipment	Cost Report Instructions	\$ 1,582	\$ (668)	
6	1	7	Supplies	Screening	To reclassify minor equipment and furniture	Cost Report Instructions		\$ (124)	\$ 791
2	1	7	Supplies	Assessment	To reclassify computer equipment	Cost Report Instructions	\$ 7,285	\$ (2,957)	
6	1	7	Supplies	Assessment	To reclassify minor equipment and furniture	Cost Report Instructions		\$ (549)	\$ 3,779
2	1	7	Supplies	Case Management	To reclassify computer equipment	Cost Report Instructions	\$ 76,560	\$ (34,272)	
6	1	7	Supplies	Case Management	To reclassify minor equipment and furniture	Cost Report Instructions		\$ (1,491)	\$ 40,797
2	1	7	Supplies	Provider Relations	To reclassify computer equipment	Cost Report Instructions	\$ 3,430	\$ (1,356)	
6	1	7	Supplies	Provider Relations	To reclassify minor equipment and furniture	Cost Report Instructions		\$ (252)	\$ 1,822
1	1	11	Other Expense	General Admin.	To reclassify indirect salaries	Cost Report Instructions	\$ 67,204	\$ (1,005)	
3	1	11	Other Expense	General Admin.	To remove non-federal reimbursable costs related to economic development conference.	2 CFR 200.405 (a), 200.413(a), Cost Allocation Plan		\$ (44)	
4	1	11	Other Expense	General Admin.	To reclassify computer equipment	Cost Report Instructions		\$ (832)	
5	1	11	Other Expense	General Admin.	To remove expense for capital asset that was already capitalized	Cost Report Instructions		\$ (277)	
7	1	11	Other Expense	General Admin.	To reclassify minor equipment	Cost Report Instructions		\$ (17)	\$ 65,029
1	1	11	Other Expense	Screening	To reclassify indirect salaries	Cost Report Instructions	\$ 57,143	\$ (881)	
3	1	11	Other Expense	Screening	To remove non-federal reimbursable costs related to economic development conference.	2 CFR 200.405 (a), 200.413(a), Cost Allocation Plan		\$ (39)	
4	1	11	Other Expense	Screening	To reclassify computer equipment	Cost Report Instructions		\$ (729)	
5	1	11	Other Expense	Screening	To remove expense for capital asset that was already capitalized	Cost Report Instructions		\$ (243)	
7	1	11	Other Expense	Screening	To reclassify minor equipment	Cost Report Instructions		\$ (15)	\$ 55,237



**SUMMARY OF COST AND EXPENSE ADJUSTMENTS (Continued)**

Program: Passport

COST REPORT									
Finding Number	Worksheet	Line	Account	Cost Center	Type of Finding	Specific Compliance Citation	Reported Costs	Adjustment	Adjusted Cost
1	1	11	Other Expense	Assessment	To reclassify indirect salaries	Cost Report Instructions	\$ 238,955	\$ (3,900)	
3	1	11	Other Expense	Assessment	To remove non-federal reimbursable costs related to economic development conference.	2 CFR 200.405 (a), 200.413(a), Cost Allocation Plan		\$ (171)	
4	1	11	Other Expense	Assessment	To reclassify computer equipment	Cost Report Instructions		\$ (3,229)	
5	1	11	Other Expense	Assessment	To remove expense for capital asset that was already capitalized	Cost Report Instructions		\$ (1,076)	
7	1	11	Other Expense	Assessment	To reclassify minor equipment	Cost Report Instructions		\$ (67)	\$ 230,511
1	1	11	Other Expense	Case Management	To reclassify indirect salaries	Cost Report Instructions	\$ 716,681	\$ (10,595)	
3	1	11	Other Expense	Case Management	To remove non-federal reimbursable costs related to economic development conference.	2 CFR 200.405 (a), 200.413(a), Cost Allocation Plan		\$ (466)	
4	1	11	Other Expense	Case Management	To reclassify computer equipment	Cost Report Instructions		\$ (8,774)	
5	1	11	Other Expense	Case Management	To remove expense for capital asset that was already capitalized	Cost Report Instructions		\$ (2,924)	
7	1	11	Other Expense	Case Management	To reclassify minor equipment	Cost Report Instructions		\$ (182)	\$ 693,741
1	1	11	Other Expense	Provider Relations	To reclassify indirect salaries	Cost Report Instructions	\$ 113,792	\$ (1,788)	
3	1	11	Other Expense	Provider Relations	To remove non-federal reimbursable costs related to economic development conference.	2 CFR 200.405 (a), 200.413(a), Cost Allocation Plan		\$ (79)	
4	1	11	Other Expense	Provider Relations	To reclassify computer equipment	Cost Report Instructions		\$ (1,481)	
5	1	11	Other Expense	Provider Relations	To remove expense for capital asset that was already capitalized	Cost Report Instructions		\$ (493)	
7	1	11	Other Expense	Provider Relations	To reclassify minor equipment	Cost Report Instructions		\$ (31)	\$ 109,920

**SUMMARY OF COST AND EXPENSE ADJUSTMENTS (Continued)**

Program: Assisted Living

COST REPORT									
Finding Number	Worksheet	Line	Account	Cost Center	Type of Finding	Specific Compliance Citation	Reported Costs	Adjustment	Adjusted Cost
1	1	1	Salaries	General Admin.	To reclassify indirect salaries	Cost Report Instructions	\$ 124	\$ 2	\$ 126
1	1	1	Salaries	Assessment	To reclassify indirect salaries	Cost Report Instructions	\$ 14,653	\$ 179	\$ 14,832
1	1	1	Salaries	Case Management	To reclassify indirect salaries	Cost Report Instructions	\$ 14,985	\$ 190	\$ 15,175
1	1	11	Other Expense	Administration	To reclassify indirect salaries	Cost Report Instructions	\$ 89	\$ (2)	\$ 87
1	1	11	Other Expense	Assessment	To reclassify indirect salaries	Cost Report Instructions	\$ 9,844	\$ (179)	
3	1	11	Other Expense	Assessment	To remove non-federal reimbursable costs related to economic development conference.	2 CFR 200.405 (a), 200.413(a), Cost Allocation Plan		\$ (8)	
5	1	11	Other Expense	Assessment	To remove expense for capital asset that was already capitalized	Cost Report Instructions		\$ (49)	\$ 9,608
1	1	11	Other Expense	Case Management	To reclassify indirect salaries	Cost Report Instructions	\$ 10,472	\$ (190)	
3	1	11	Other Expense	Case Management	To remove non-federal reimbursable costs related to economic development conference.	2 CFR 200.405 (a), 200.413(a), Cost Allocation Plan		\$ (8)	
5	1	11	Other Expense	Case Management	To remove expense for capital asset that was already capitalized	Cost Report Instructions		\$ (53)	\$ 10,221
<b>Total Effect on Cost Report</b>								<b>\$ (5,930)</b>	

# OHIO AUDITOR OF STATE KEITH FABER



**BUCKEYE HILLS REGIONAL COUNCIL**

**WASHINGTON 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 2/27/2024**

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[www.ohioauditor.gov](http://www.ohioauditor.gov)