



Dave Yost • Auditor of State

CLINTON COUNTY BOARD OF DEVELOPMENTAL DISABILITIES

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Independent Accountant's Report on Applying Agreed-Upon Procedures

Halina Schroeder, Audit Chief
Ohio Department of Developmental Disabilities, Office of Audits
30 E. Broad Street, 13th Floor
Columbus, Ohio 43215

Dear Ms. Schroeder:

As permitted by Ohio Rev. Code § 5123.05 and as required by the *Application for a § 1915(c) HCBS Waiver*, Appendix I-2(c), the Auditor of State's Office performed the procedures enumerated below, to which the Ohio Department of Developmental Disabilities (DODD) agreed. The purpose is to assist you in evaluating whether the Clinton County Board of Developmental Disabilities (County Board) prepared its *Income and Expenditure Report* for the years ended December 31, 2009 and 2010 (Cost Reports) in accordance with DODD's Guide to Preparing Income and Expenditure Reports for 2009 and 2010 (Cost Report Guides) and to assist you in evaluating whether reported receipts and disbursements complied with 2 CFR 225 (OMB Circular A-87 *Cost Principles for State, Local, and Indian Tribal Governments*), and other compliance requirements described in the procedures below. The County Board's management is responsible for preparing these reports. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of DODD. 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.

Statistics – Square Footage

1. DODD requested us to tour the facilities to identify how space was used by County Board programs and to identify new, closed or empty buildings along with rented or idle space and, if final 2008 square footage totals are the same and no significant changes in the floor plan have occurred, to perform no additional procedures.

We toured the facilities to identify how space was used by County Board programs and to identify new, closed or empty buildings along with rented or idle floor space. We found no unreported rented or idle floor space.

We compared 2009 and 2010 square footage totals to final 2008 square footage totals and we discussed square footage changes with the County Board and we noted no significant changes have occurred and we performed limited procedures below.

2. DODD requested us to report variances if the County Board's square footage for three rooms varied by more than 10 percent of the square footage reported in the summary which rolls up to *Schedule B-1, Section A, Square Footage* of the Cost Reports.

We did not perform this procedure as there were no significant square footage changes from the final 2008 square footage to square footage reported in 2009 and 2010.

3. DODD requested us to report variances if the County Board's square footage for one floor plan varied by more than 10 percent of the square footage reported in the summary which rolls up to *Schedule B-1, Section A, Square Footage* of the Cost Reports.

We did not perform this procedure as there were no significant square footage changes from the final 2008 square footage to square footage reported in 2009 and 2010.

4. DODD requested us to report variances if the County Board's square footage summary varied by more than 10 percent when comparing the County Board's summary to the Cost Report for any cell within *Schedule B-1, Section A, Square Footage* worksheet.

We did not perform this procedure as there were no significant square footage changes from the final 2008 square footage to square footage reported in 2009 and 2010.

5. DODD asked us to obtain the County Board's methodology for allocating square footage between programs and reviewed the methodology to ensure that square footage for areas shared by more than one type of service is allocated by program based on reported usage of the area in accordance with the Cost Report Guides.

We did not perform this procedure as there were no significant square footage changes from the final 2008 square footage to square footage totals reported in 2009 and 2010. However, during our review of the final 2008 and 2009, and 2010 square footage totals we found that square footage should be allocated for the MAC Coordinator and Assistant MAC Coordinator. We reported these variances in Appendix A (2009) and Appendix B (2010).

Statistics – Attendance

1. We reviewed the Cost Reports to determine if individuals served or units of service were omitted on *Schedule B-1, Section B, Attendance Statistics*, worksheet 4, or worksheets 7A to 7H which result in unassigned program or general expenses-all program costs.

We determined that there were no individuals served or units of service omitted on *Schedule B-1, Section B, Attendance Statistics*, worksheet 4, or worksheets 7A to 7H which resulted in unassigned program or general expenses-all program costs.

2. DODD asked us to compare the County Board's final 2008 typical hours of service reported on *Schedule B-1, Section B, Attendance statistics* to the typical hours of service reported on Schedule B-1 for 2009 and 2010 and, if the hours are the same, to do no additional procedures.

We compared the final 2008 typical hours of service to the typical hours of service reported on Schedule B-1 for 2009 and 2010. We found the typical hours of service reported in 2009 did not change from 2008.

3. DODD requested us to report variances if the County Board's attendance statistics were not within two percent of the attendance statistics reported to DODD.

We compared the County Board's Clinton Attendance By Month All Clients - By Age Group reports for the number of individuals served, days of attendance, with similar information reported for Day Habilitation/Adult Day Services/Vocational Habilitation, and Enclave on *Schedule B-1, Section B, Attendance Statistics* of the Cost Reports and determined if the statistics were reported in accordance with the Cost Report Guides. We also footed the County Board's reports on Attendance Statistics for accuracy.

We found variances or computational errors exceeding two percent in 2010. We reported these variances in Appendix B (2010). We found no variances in 2009.

4. DODD requested us to report variances if the County Board's number of individuals served varied by more than 10 percent when compared to the prior year's final attendance statistics on *Schedule B-1, Section B, Attendance Statistics*.

We compared the County Board's final 2008 number of individuals served to the final individuals served for Day Habilitation/Adult Day Services/Vocational Habilitation, Enclave for 2009 and the final 2009 individual served to the final individuals served for 2010 on *Schedule B-1, Section B, Attendance Statistics* and determined if the variances were over 10 percent.

The number of reported individuals served did not change by more than 10 percent from the prior year's Schedule B-1.

5. DODD requested us to report variances if the individuals served on *Schedule B-1, Section B, Attendance Statistics* of the Cost Reports were not within three of the individuals documented on the attendance sheets.

We did not perform this test since the number of reported individuals in Procedure 4 above did not change by more than 10 percent from prior year's Schedule B-1.

Statistics – Transportation

1. DODD requested us to report variances if the Board's transportation units were not within two percent of total units reported on each line of *Schedule B-3, Quarterly Summary of Transportation Statistics*.

We compared the number of one-way trips from the Print Transportation by Age Group reports for adults; and report with trips for pre-school compiled manually with those statistics as reported in *Schedule B-3, Quarterly Summary of Transportation Statistics* of the Cost Reports. We also footed Print Transportation by Age Group reports and report with trips for pre-school compiled manually for accuracy.

We found variances or computational errors exceeding two percent for 2009 as reported in Appendix A (2009). We found no differences in 2010.

2. DODD requested us to report variances of more than 10 percent of the total trips taken for five individuals for both 2009 and 2010, between the County Board's internal documentation versus the amount reported on *Schedule B-3, Quarterly Summary of Transportation Services*.

We traced the number of trips for four adult individuals in February 2009 and four adult individuals in September 2010 from the County Board's daily reporting documentation to *Schedule B-3, Quarterly Summary of Transportation Services*. We also traced the number of children's trips for one child in March 2009 and one child in September 2010 from the County Board's daily reporting documentation to *Schedule B-3, Quarterly Summary of Transportation Services*.

We found no differences.

3. DODD requested us to report variances if the County Board's cost of bus tokens/cabs was not within two percent of the total amount reported on *Schedule B-3, Quarterly Summary of Transportation Statistics*.

We did not perform this procedure as the County Board did not report the cost of bus tokens, cabs on Schedule B-3 of the Cost report for 2009 and 2010. However, we did review the County Board's detailed expenditure report for any of these costs not identified by the County Board (see procedures and results in the Non-Payroll Expenditures and Reconciliation to the County Audit Report Section).

Statistics – Service and Support Administration (SSA)

1. DODD requested us to report variances if the County Board's SSA units were not within two percent of total units reported on each line of *Schedule B-4, Quarterly Summary of Units of Service – Service and Support Administration*.

We compared the number of SSA units (Targeted Case Management (TCM), Other SSA Allowable) from the TCM Units and Receivable Billing Reimbursable Summary by Fund, Source, and Service reports for TCM Units and the Quarterly Detailed Units Marked Non-Billable for SSA Unallowable units to those statistics reported in *Schedule B-4, Quarterly Summary of Units of Service – Service and Support Administration*. We also footed the County Board's SSA unit reports for accuracy.

We found differences as reported in Appendix A (2009) and Appendix B (2010).

2. DODD requested us to report variances if the Other SSA Allowable units tested had an error rate exceeding 10 percent and indicated a systemic issue.

We haphazardly selected a sample of 40 Other SSA Allowable units for both 2009 and 40 Other SSA Allowable units for 2010 from the Unit Entry by Date Span reports and determined if the case note documentation described activities listed in Ohio Admin. Code § 5101:3-48-01(D), and also included the documentation required by Ohio Admin. Code § 5101:3-48-01(F). We also determined if the units for Other Allowable SSA services for both 2009 and 2010 were provided to individuals that were not Medicaid eligible at the time of service delivery per the Medicaid Information Technology System (MITS).

The units found to be in error did not exceed 10 percent of our sample for 2009.

From the sample population of 4341 Other SSA Allowable units for 2010, we selected our sample of 40 Other Allowable SSA units and found 37.5 percent of those units were for unallowable activities. We selected another 60 Other Allowable SSA units and we found 10 percent of those units were for unallowable activities and we projected and then reclassified 434 units as Unallowable TCM units based on the lower 10 percent error rate.

We reported the differences in Appendix B (2010).

3. We haphazardly selected a sample of 40 Unallowable SSA service units for both 2009 and 2010 from the Unit Entry by Date Span reports and determined if the case note documentation described activities listed in Ohio Admin. Code § 5101:3-48-01(D), and also included the documentation required by Ohio Admin. Code § 5101:3-48-01(F).

We found no errors.

4. DODD requested us to report decreases exceeding five percent in total SSA units by line on *Schedule B-4* when compared to the prior year's final cost report.

We compared the final 2008 SSA units to the final 2009 SSA units and compared the final 2009 SSA units to the final 2010 SSA units.

The final SSA TCM units decreased by more than five percent from the prior year's *Schedule B-4* and we obtained the County Board's explanation that although total units increased, there were more Non-Medicaid consumers in 2010. We noted that Unallowable SSA units declined between 2008 and 2009 because an adjustment was made in Procedure 1 above to remove non-individual specific activities (general time units) as described in *Worksheet 9, Service and Support Administration Costs* of the Cost Report Guides.

We reported no variances in Appendix A (2009) and Appendix B (2010).

Revenue Cost Reporting and Reconciliation to the County Auditor Report

1. We compared the receipt totals from the 12/31/2009 and 12/31/2010 County Auditor's Revenue Report Summary Activity for the Operating (004), Contingency (009), Levy (100), Susan Lacy (240), and Health Insurance (654) funds to the County Auditor's report totals reported on the *Reconciliation to County Auditor Worksheets*.

We found differences as reported in Appendix A (2009) and Appendix B (2010).

2. DODD asked us to determine whether total County Board receipts reported in the *Reconciliation to County Auditor Worksheets* reconciled within 1/4 percent of the county auditor's yearly report of total receipts for these funds.

Total county board receipts were within 1/4 percent of the county auditor yearly receipt totals reported for these funds.

3. DODD asked that we compare the account description and amount for each revenue reconciling item on the *Reconciliation to County Auditor Worksheet* to the County Board's detailed revenue

reports and other supporting documentation unless Procedure 2 above reconciled within the 1/4 percent threshold.

We did not perform this procedure since the total County Board receipts were within 1/4 percent of the County Auditor yearly receipt totals after the adjustments in Procedure 2 above were made.

4. We compared revenue entries on *Schedule C, Income Report* to the Souther Ohio Council of Government (SOCOG) prepared County Board Summary Workbook.

We found differences as reported in Appendix A (2009).

5. We reviewed the *Schedule C, Income Report* to determine whether revenues are maintained separately to offset corresponding expense via the use of specific expenditure costs centers and identified any potential revenue offsets/applicable credits.

We identified the following sources of potential revenue credits for which the County Board did not offset costs on the Cost Reports in accordance with 2 CFR 225, Appendix A (C)(3)(c) and (4)(a):

- Miscellaneous refunds, reimbursements and other income in the amount of \$107,350 in 2009 and \$175,608 in 2010;
- Title XX revenues in the amount of \$27,853 in 2009 and \$21,389 in 2010;
- IDEA Part B revenues in the amount of \$5,672 in 2009;
- IDEA Early Childhood Special Education revenues in the amount of \$2,545 in 2009 and \$3,813 in 2010; and
- Title V revenues in the amount of \$41 in 2009.

We also noted Ohio Rehabilitation Services Commission revenues in the amount of \$6,545 in 2009; however, corresponding expenses were offset on *Schedule a1, Adult Program Worksheet* as reported in Appendix A (2009).

Paid Claims Testing

1. We selected 50 paid claims among all service codes from 2009 and 2010 from the Medicaid Billing System (MBS) data and determined if the claims met the following service documentation requirements of Ohio Admin. Code Sections 5123:2-9-05, 5123:2-9-18(H)(1)-(2), and 5101:3-48-01(F):

- Date of service;
- Place of service;
- Name of the recipient;
- Name of the provider;
- Signature of the person delivering the service or initials of the person delivering the service if the signature and corresponding initials are on file with the provider;
- Type of service (for homemaker/personal care, type must include if routine, on-site/on-call, or level one emergency);
- Number of units of the delivered service or continuous amount of uninterrupted time during which the service was provided; and
- Arrival and departure times of the provider of service's site visit to the recipient's location or of the recipient's visit to the provider of service's location.¹

We found one instance of non-compliance with these documentation requirements for 2009 as reported below.

¹ For non-medical transportation (service codes) we reviewed similar service documentation requirements to ensure compliance with Ohio Admin. Code § 5123:2-9-18(H)(1)-(2) excluding (H)(1)(d),(f),(j) and (H)(2)(d),(f).

Recoverable Finding - 2009

Finding \$28.09

We determined the County Board was over reimbursed for 2 units of ATB transportation service which were for Board field trips.

Service Code	Units	Review Results	FFP ¹ Amount	eFMAP ² Amount	Total Finding
ATB	2	County Board did not have supporting documentation	\$24.25	\$3.84	\$28.09
TOTAL					\$28.09

¹ Federal Financial Participation Amount (FFP)

² Enhanced Federal Medical Assistance Percentage (eFMAP)

In addition, to the finding above upon further review of the 2009 and 2010 MBS data we found other dates where four units were billed for non-medical transportation in a day. DODD requested that we select a sample of 60 trips in both 2009 and 2010 to determine if any trips were field trips that would be covered under the County Board's reimbursement for day support services.

We reviewed these claims in MITS and found that 20 units in 2009 and 16 units in 2010 had been adjusted and only 2 trips to adult programs were reimbursed each day to the County Board. We reviewed daily transportation route sheets and Individualized Service Plans and found that 30 percent in 2009 and 50 percent in 2010 of the remaining unadjusted trips were for field trips which would be covered under the County Board's reimbursement for day support services (see Recoverable Finding section below). Had we selected a larger statistical sample population additional findings might have been reported. However, we did project and remove 194 and 318 field trips units from *Schedule B-3, Quarterly Summary of Transportation Services* in accordance with the Cost Report Guidelines.

Recommendation:

The County Board should develop procedures to ensure transportation trips are not over reimbursed in order to comply with Ohio Administrative Code § 5123:2-9-18 (B)(9)(a) which states in pertinent part, "Billing for the provision of non-medical transportation is limited to those times when an individual is transported to, from, and/or between sites where adult day support, vocational habilitation, supported employment-enclave, and/or supported employment-community waiver services are provided to the individual."

Recoverable Finding - 2009

Finding \$167.27

We determined the County Board was over reimbursed for 12 units of ATB transportation service which were for Board field trips when they were already reimbursed for day support services.

Service Code	Units	Review Results	FFP ¹ Amount	eFMAP ² Amount	Total Finding
ATB	12	Board should not bill field trips	\$144.04	\$23.23	\$167.27

¹ Federal Financial Participation Amount (FFP)

² Enhanced Federal Medical Assistance Percentage (eFMAP)

Recoverable Finding - 2010

Finding \$306.18

We determined the County Board was over reimbursed for 22 units of ATB/FTB transportation service which were for Board field trips when they were already reimbursed for day support services.

Service Code	Units	Review Results	FFP ¹ Amount	eFMAP ² Amount	Total Finding
ATB/FTB	22	Board should not bill field trips	\$267.18	\$39.00	\$306.18

¹ Federal Financial Participation Amount (FFP)

² Enhanced Federal Medical Assistance Percentage (eFMAP)

2. DODD requested us to report variances if units reimbursed by Medicaid were more than the units reported in the Cost Reports.

We compared the number of reimbursed TCM units from the MBS Summary by Service Code report, to the final units on *Schedule B-4, Quarterly Summary of Units of Service – Service and Support Administration*, Line (1)(F), *TCM Units*.

We found no instance where the Medicaid reimbursed units were greater than audited TCM units for 2010.

In 2009, we initially found Medicaid reimbursed units of 18,461 were 107 units greater than the County Board's TCM units report of 18,354 units. The County Board provided an updated 2009 Billable Unit Report listing 18,802 TCM claims. We performed a data comparison of each TCM claim of the 2009 Billable Unit report against the MBS claims data. We found no TCM claims where the Medicaid reimbursed units in MBS were greater than the amount reported in the 2009 Billable Unit report.

3. DODD requested us to report whether any reimbursements exceeded disbursements on *Schedule A, Summary of Service Costs-By Program* worksheet by two percent.

We compared the amounts reported on *Schedule A, Summary of Service Costs – By Program*, Lines (20) Environmental Accessibility Adaptations to Line (25) Community Residential to the amount reimbursed for these services in 2009 and 2010 on the MBS Summary by Service Code report.

We found no differences as the Board does not have services on *Schedule A, Summary of Service Costs – By Program*, for Lines (20) to Line (25). We reviewed the MBS Summary by Service Code report and found the County Board did not get reimbursed for these services in 2009 and 2010.

Non-Payroll Expenditures and Reconciliation to the County Auditor Report

1. We compared the disbursement totals from the 12/31/2009 and 12/31/2010 County auditor's report listed on the *Reconciliation to County Auditor Worksheets* to the County Auditor's Expenditure Fund Summary balances for the Operating (004), Contingency (009), Levy (100), Susan Lacy (240), and Health Insurance (654) funds.

We found differences as reported in Appendix A (2009).

2. DODD asked us to determine whether total County Board disbursements reported in the *Reconciliation to County Auditor Worksheets* reconciled within 1/4 percent of the county auditor's yearly report of total disbursements for these funds.

Total county board disbursements were within 1/4 percent of the county auditor yearly disbursement totals reported for these funds.

3. DODD asked that we compare the account description and amount for each reconciling item on the Reconciliation to County Auditor Worksheet to the County Board's detailed disbursement reports and other supporting documentation unless Procedure 2 above reconciled within the 1/4 percent threshold.

We did not perform this procedure since the total County Board disbursements were within ¼ percent of the County Auditor yearly disbursement totals in Procedure 2 above.

4. DODD asked us to compare the County Board's detailed disbursements to the amounts reported on Worksheets 2 through 10, and report variances exceeding \$100 for service contracts and other expenses on any Worksheet.

We compared all Service Contract and Other Expenses entries on Worksheets 2 through 10 to the County Board's State Expenses Detailed reports.

We found no differences exceeding \$100 on any worksheet.

5. We compared disbursement entries on *Schedule A, Summary of Service Costs – By Program* and Worksheets 2 through 10 to the SOCOG prepared County Board Summary Workbook.

We found no differences.

6. DODD asked us to determine whether the County Board's detailed expense reports were properly classified, on Worksheets 2 through 10, within two percent of total service contracts and other expenses for each individual Worksheet and that no Worksheet included disbursements over \$100 which are non-federal reimbursable under 2 CFR 225 Appendix B.

We scanned the County Board's State Expenses Detailed reports for service contracts and other expenses in the following columns and worksheets: Column X-Gen Expense all Programs on Worksheets 2, 3 and 8; Column N-Service and Support Admin Costs on Worksheet 9; and Columns E-Facility Based Services, and G-Community Employment on Worksheet 10 and reviewed documentation to identify disbursements not classified as prescribed by the Cost Report Guides or costs which are non-federal reimbursable under 2 CFR 225 Appendix B.

We found differences as reported in Appendix A (2009) and Appendix B (2010) for misclassified and non-federal reimbursable costs.

7. We scanned the County Board's State Expenses Detailed for items purchased during 2009 and 2010 that met the County Board's capitalization criteria and traced them to inclusion on the County Board's Fixed Asset Report.

We reported differences for purchases that were not properly capitalized as reported in Appendix A (2009). However, we did not determine if 2010 purchases were properly capitalized in 2011.

8. We haphazardly selected 20 disbursements from 2009 and 2010 from the County Board's State Expenses Detailed report that were classified as service contract and other expenses on Worksheets 2-10 (not selected for scanning under Step 6 above). We determined if supporting documentation was maintained as required by 2 CFR 225 (OMB Circular A-87, Appendix A, (C)(1)(j)) and the disbursement was properly classified according to the Cost Report Guides.

We reported differences from these procedures in Appendix A (2009) and Appendix B (2010) for misclassified and non-federal reimbursable costs.

Property, Depreciation, and Asset Verification Testing

1. We compared the County Board's procedures regarding capitalization of fixed assets with the Cost Report Guides for preparing *Worksheet 1, Capital Costs* and 2 CFR 225 (OMB Circular A-87, Appendix B, 15(a)(2)).

We found no inconsistencies between the County Board's capitalization procedures and the guidelines listed above.

2. We compared the County Board's final 2008 Depreciation Schedule to the County Board's 2009 and 2010 Depreciation Schedules for changes in the depreciation amounts for assets purchased prior to the periods under review which were not in compliance with the Cost Report Guides.

We found differences in depreciation as reported in Appendix A (2009) and Appendix B (2010).

Recommendation:

Although the County Board kept supporting documentation for depreciation costs reported on *Worksheet 1, Capital Costs* we found errors that caused inaccuracies in those reported costs. The County Board stated that the errors which caused several fixed assets not to be carried forward from the 2008 depreciation schedule to 2009 and 2010 and one fixed asset which had a change in depreciable amount were due to their accounting software.

Therefore, we recommend the County Board create a depreciation schedule to meet the requirements contained in the Cost Report Guidelines which specify that "each county mrdd board must establish and maintain an ongoing record or ledger of asset acquisition and placed in service and depreciation calculation.... The asset record or ledger must be structured to include asset description, asset number corresponding to the tagged asset, purchase date, useful life, historical cost, salvage value (minimum 10%), current depreciation amount calculated using the straight-line method and accumulated depreciation amount." and the Documentation requirements contained in the Cost Report Guidelines which state that "Report all revenue received and expenditures made by the county mrdd board during the calendar year, including appropriate depreciation costs for capital expenditures."

3. DODD asked us to compare the depreciation costs reported in the County Board's depreciation schedule to the amounts reported on *Worksheet 1, Capital Costs*, and to report variances exceeding \$100.

We compared all depreciation entries reported on *Worksheet 1, Capital Costs* to the County Board's depreciation schedules.

We found no differences exceeding \$100.

4. We scanned the County Board's Depreciation Schedule for 2009 and 2010 for depreciation taken on the same asset more than once, assets that have been fully depreciated in prior years, or depreciation taken on assets during the period of acquisition which were not in compliance with the Cost Report Guides.

We found no differences.

5. We haphazardly selected two of the County Board's fixed assets which meet the County Board's capitalization policy and purchased in either 2009 or 2010 to determine if their useful life agreed to the estimated useful lives prescribed in the 2008 American Hospital Association (AHA) Asset Guide. We also recomputed the first year's depreciation for these assets, based on their cost, acquisition date and period of useful life to determine compliance with the Cost Report Guides and AHA Asset Guide.

We found differences as reported in Appendix A (2009).

6. We selected six disposed assets in 2009 and 2010 from the County Board's list of disposed assets and determined if the asset was removed from the County Board's fixed asset ledger. We also recalculated depreciation and any gain or loss applicable to 2009 and 2010 for the disposed items based on its undepreciated basis and any proceeds received from the disposal or sale of the asset to determine compliance with the Cost Report Guide and CMS Publication 15-1, Chapter 1.

We found differences as reported in Appendix B (2010).

Payroll Testing

1. DODD asked us to determine whether total County Board salaries and benefits in the 2009 and 2010 cost reports were within two percent of the county auditor's report totals for the Operating (004), Levy (100), Susan Lacy (240), and Health Insurance (654) funds.

We totaled salaries and benefits from Worksheets 2-10 from the 2009 and 2010 cost reports and compared the yearly totals to the county auditor's expenditure report summaries.

The variance was less than two percent.

2. DODD asked us to compare the County Board's detailed payroll reports to the amounts reported on Worksheets 2 through 10, and to report variances exceeding \$100 for salaries or employee benefit expenses.

We compared all Salary and Employee Benefit entries on Worksheets 2 through 10 to State Expenses Payroll Only by SAC/Employee Summary Reports for 2009 and 2010.

We found differences as reported in Appendix A (2009).

3. We selected 12 employees and compared the County Board's table of organization and job descriptions to the worksheet in which each employee's salary and benefit costs were allocated to ensure allocation is consistent with the Cost Report Guides

We found no differences.

4. We scanned the State Expenses Payroll Only by SAC/Employee Summary Reports for 2009 and 2010 and compared classification of employees to entries on Worksheets 2 through 10 to determine if salary and benefit costs were reported in accordance with the Cost Report Guides.

We found no differences.

Medicaid Administrative Claiming (MAC)

1. DODD asked us to contact its Office of Audits to report differences if the MAC salary and benefits exceeded the County Board's payroll records by one percent or more.

We compared the salary and benefits entered on the Individual MAC Costs by Code and MAC Random Moment Time Summary (RMTS) reports to the County Board's State Expenses Payroll Only by SAC/Employee Summary Reports.

We found no variance exceeding one percent.

2. We compared the original Individual MAC Costs by Code and MAC Random Moment Time Summary (RMTS) Report(s) to Worksheet 6, columns (I) and (O) for both years.

We reported differences in Appendix A (2009) and Appendix B (2010).

3. We compared Ancillary Costs on the Roll Up Report for the Ohio Department of Job and Family Services to Lines 6-10 of the *MAC Reconciliation Worksheet*.

We reported differences in Appendix A (2009) and Appendix B (2010).

4. We selected 11 RMTS observed moments completed by employees of the County Board from the DODD RMTS Participant Moments Question and Answer report for the fourth quarter of 2010 in which they documented their time spent on administering Medicaid-funded programs. We determined if supporting documentation of the County Board employees' activity for each observed moment was maintained and the observed moment was properly classified in accordance with DODD's Guide to Medicaid Administrative Claiming (MAC) using the Random Moment Time Studies (RMTS) Methodology for 2010.

We found one RMTS observed moment for Activity Code 11 - Program Planning, Development and Interagency Coordination of Medicaid Services that lacked supporting documentation showing the date and time of the observed moment.

We have reported this instance of non-compliance to DODD.

We did not receive a response from officials to the exceptions noted above.

We were not engaged to and did not conduct an audit, the objective of which would be the expression of an opinion on the County Board's Cost Reports. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the use of the managements of the County Board, DODD, the Ohio Department of Job and Family Services, and the Centers for Medicare and Medicaid Services and is not intended to be, and should not be used by anyone other than these specified parties.

Sincerely,

A handwritten signature in black ink that reads "Dave Yost". The signature is written in a cursive style with a large, looping "D" and "Y".

Dave Yost
Auditor of State

April 2, 2013

cc: J. Kyle Lewis, Superintendent, Clinton County Board of Developmental Disabilities
Julie Easter, Business Manager, Clinton County Board of Developmental Disabilities
Roberta Taylor, Board President, Clinton County Board of Developmental Disabilities

Appendix A
Clinton County Board of Developmental Disabilities
2009 Income and Expenditure Report Adjustments

	Reported Amount	Correction	Corrected Amount	Explanation of Correction
Schedule A				
19. Room and Board/Cost to Live (L) Community Residential	\$ 20,331	\$ 8,428	\$ 28,759	To reclassify room and board expenditures.
Schedule B-1, Section A				
17. Medicaid Administration (A) MAC	-	97	180	To report MAC square footage
22. Program Supervision (B) Adult	2,185	(83)	2,102	To report MAC square footage
23. Administration (D) General	3,724	(97)	3,627	To reclassify MAC square footage
Schedule B-3				
2. Children 3-5 (G) One Way Trips- Fourth Quarter	715	(180)	535	To remove field trips
5. Facility Based Services (G) One Way Trips Fourth Quarter	4,861	(194)	4,667	To remove field trips
Schedule B-4				
2. Other SSA Allowable Units (E) COG Activity	2	(2)	-	To remove units incorrectly put for COG
5. SSA Unallowable Units (A) 1st Quarter	1,183	(253)	930	To remove General Support time
5. SSA Unallowable Units (B) 2nd Quarter	233	(233)	-	To remove General Support time
5. SSA Unallowable Units (C) 3rd Quarter	292	(292)	-	To remove General Support time
5. SSA Unallowable Units (D) 4th Quarter	79	(79)	-	To remove General Support time
Schedule C				
II. Department of MR/DD				
(E) Residential Facility- Non Waiver Services- COG Revenue	\$ 6,000	\$ (6,000)	\$ -	To revise COG revenue
Worksheet 1				
2. Land Improvements (X) Gen Expense All Prgm.	\$ 1,424	\$ 1,551	\$ 2,975	To adjust depreciation.
3. Buildings/Improve (E) Facility Based Services	\$ 6,140	\$ 435	\$ 7,185	To adjust depreciation.
5. Movable Equipment (N) Service & Support Admin	\$ -	\$ 610	\$ 1,479	To adjust depreciation.
5. Movable Equipment (U) Transportation	\$ 35,767	\$ (16,200)	\$ 19,567	To adjust depreciation.
Worksheet 2				
1. Salaries (X) Gen Expense All Prgm.	\$ 225,994	\$ (118,885)	\$ 107,109	To subtract MAC -Fultz, Landers, Lewis
4. Other Expenses (O) Non-Federal Reimbursable	\$ 56,314	\$ 1,819	\$ 2,059	To reclassify as non federal reimburseable item.
		\$ 240	\$ 2,059	To reclassify as non federal reimburseable item.
		\$ (56,314)	\$ 2,059	To reclassify non federal reimburseable fees
4. Other Expenses (X) Gen Expense All Prgm.	\$ 33,796	\$ (1,819)	\$ 31,977	To reclassify as non federal reimburseable item.
10. Unallowable Fees (O) Non-Federal Reimbursable	\$ -	\$ 78,098	\$ 134,412	To adjust for tax settlement fees.
		\$ 56,314	\$ 134,412	To reclassify non federal reimburseable fees
Worksheet 2A				
1. Salaries (N) Service & Support Admin	\$ 74,038	\$ (71,372)	\$ 2,666	To revise MAC salaries - Hart
Worksheet 3				
4. Other Expenses (L) Community Residential	\$ 11,473	\$ (7,400)	\$ 4,073	To reclassify non-profit housing agency advance for roof.
Worksheet 5				
3. Service Contracts (L) Community Residential	\$ 78,360	\$ (8,428)	\$ 69,932	To reclassify room and board expenditures.
4. Other Expenses (L) Community Residential	\$ 23,405	\$ 7,400	\$ 30,805	To reclassify non-profit housing agency advance for roof.
Worksheet 6				
1. Salaries (I) Medicaid Admin	\$ -	\$ 90,426	\$ 90,426	To report MAC claimable amount
1. Salaries (O) Non-Federal Reimbursable	\$ -	\$ 148,313	\$ 148,313	To report MAC NFR amount
Worksheet 8				
4. Other Expenses (O) Non-Federal Reimbursable	\$ -	\$ 180	\$ 180	To reclassify as non federal reimburseable item.
4. Other Expenses (X) Gen Expense All Prgm.	\$ 48,973	\$ (180)	\$ 48,793	To reclassify as non federal reimburseable item.
Worksheet 9				
1. Salaries (N) Service & Support Admin. Costs	\$ 300,857	\$ (48,482)	\$ 252,375	To revise MAC salaries - Johnson
4. Other Expenses (N) Service & Support Admin. Costs	\$ 24,743	\$ (240)	\$ 24,503	To reclassify costs as non federal reimburseable.
Worksheet 10				
1. Salaries (E) Facility Based Services	\$ 503,606	\$ (64,964)	\$ 438,642	To reallocate expenditures based on days of attendance
1. Salaries (F) Enclave	\$ -	\$ 65,035	\$ 65,035	To reallocate expenditures based on days of attendance
2. Employee Benefits (E) Facility Based Services	\$ 218,264	\$ (28,308)	\$ 189,956	To reallocate expenditures based on days of attendance
2. Employee Benefits (F) Enclave	\$ -	\$ 28,384	\$ 28,384	To reallocate expenditures based on days of attendance
4. Other Expenses (E) Facility Based Services	\$ 22,971	\$ (540)	\$ 22,431	To reclassify costs as non federal reimburseable.
4. Other Expenses (O) Non-Federal Reimbursable	\$ -	\$ 540	\$ 540	To reclassify costs as non federal reimburseable.
Reconciliation to County Auditor Worksheet				
Expense:				
Plus: Transfers Out-General	\$ -	\$ 401,960	\$ 401,960	To add as reconciling item Fund 654
Less: Capital Costs	\$ (85,708)	\$ 16,200	\$ (69,508)	To adjust depreciation.
		\$ (3,465)	\$ (73,583)	To adjust depreciation.
		\$ (610)	\$ (78,098)	To adjust for tax settlement fees.
Less: Auditor/Treasurer Fees	\$ -	\$ (78,098)	\$ (78,098)	To adjust for tax settlement fees.
Plus: Payroll Processing Error	\$ -	\$ 17,219	\$ 17,219	To add as reconciling item Fund 654 balance
Total from 12/31 County Auditor's Report	\$ 3,670,100	\$ 419,179	\$ 4,089,279	To correct County Auditor total
Revenue:				
Less: COG Revenue	\$ (196,024)	\$ 6,000	\$ (190,024)	To revise COG revenue
Plus: Fund 654	\$ -	\$ 466,949	\$ 466,949	To reconcile Fund 654
Total from 12/31 County Auditor's Report	\$ 4,692,220	\$ 465,277	\$ 5,157,497	To correct County Auditor total
Medicaid Administration Worksheet				
Lines 6 -10 Ancillary Costs	\$ -	\$ 4,425	\$ 4,425	To report ancillary costs
Schedule a1 adult, Allocation of Cost - Adult Program				
10. Community Employment (B) Less Revenue	\$ -	\$ 572	\$ 572	To offset Community employment salaries and benefits for Jen Steele & Brad Stidham with costs from RSC

Appendix B
Clinton County Board of Developmental Disabilities
2010 Income and Expenditure Report Adjustments

	Reported Amount	Correction	Corrected Amount	Explanation of Correction
Schedule B-1, Section A				
17. Medicaid Administration (A) MAC	-	96		To report MAC square footage
		14	110	To report MAC square footage
22. Program Supervision (B) Adult	2,185	(96)	2,089	To reclassify MAC square footage
23. Administration (D) General	3,724	(14)	3,710	To reclassify MAC square footage
Schedule B-1, Section B				
1. Total Individuals Served By Program (A) Facility Based Services	98	(6)	92	To correct individuals served.
1. Total Individuals Served By Program (B) Supported Emp. -Enclave	46	4	50	To correct individuals served.
Schedule B-3				
5. Facility Based Services (G) One Way Trips Fourth Quarter	4,599	(318)	4,281	To remove field trips
Schedule B-4				
1. TCM Units (D) 4th Quarter	1,288	2,454		To include November and December Units
		9	3,751	To reclassify for client units who were Medicaid Eligible
2. Other SSA Allowable Units (D) 4th Quarter	201	819		To include November and December Units
		(434)		To reclassify unallowable units
		(9)	577	To reclassify for client units who were Medicaid Eligible
5. SSA Unallowable Units (A) 1st Quarter	1,673	(457)		To remove General Support time units
		434	1,650	To reclassify unallowable units
5. SSA Unallowable Units (B) 2nd Quarter	460	(460)	-	To remove General Support time units
5. SSA Unallowable Units (C) 3rd Quarter	319	(319)	-	To remove General Support time units
5. SSA Unallowable Units (D) 4th Quarter	42	(42)	-	To remove General Support time units
Schedule C				
V. Other Revenues				
(H) Refunds- County Revenue	\$ 175,608	\$ (65,752)	\$ 109,856	To subtract health insurance employee reimbursement
48.	\$ 159,169	\$ (2,068)	\$ 157,101	To subtract health insurance interest
Worksheet 1				
2. Land Improvements (X) Gen Expense All Prgm.	\$ 1,424	\$ 1,551	\$ 2,975	To adjust depreciation.
3. Buildings/Improve (D) Unasn Children Programs	\$ 1,838	\$ 47	\$ 1,885	To adjust depreciation.
3. Buildings/Improve (E) Facility Based Services	\$ 6,140	\$ 435		To adjust depreciation.
		\$ 610	\$ 7,185	To adjust depreciation.
3. Buildings/Improve (V) Admin	\$ 202	\$ 47	\$ 249	To adjust depreciation.
3. Buildings/Improve (X) Gen Expense All Prgm.	\$ 28,614	\$ 242	\$ 28,856	To adjust depreciation.
5. Movable Equipment (N) Service & Support Admin	\$ -	\$ 1,479	\$ 1,479	To adjust depreciation.
5. Movable Equipment (U) Transportation	\$ 22,827	\$ (16,200)		To adjust depreciation
		\$ 19,922		To report loss on disposal of asset.
		\$ 35,296	\$ 61,845	To report loss on disposal of asset.
Worksheet 2				
1. Salaries (X) Gen Expense All Prgm.	\$ 224,150	\$ (102,320)	\$ 121,830	To reclassify unposted 1st half MAC Costs for Fultz, Landers and Lewis
4. Other Expenses (O) Non-Federal Reimbursable	\$ -	\$ 1,188	\$ 1,188	To reclassify as nonfederal reimburseable.
4. Other Expenses (X) Gen Expense All Prgm.	\$ 52,314	\$ (1,188)	\$ 51,126	To reclassify as nonfederal reimburseable.
10. Unallowable Fees (O) Non-Federal Reimbursable	\$ 57,607	\$ 75,574	\$ 133,181	To adjust for tax settlement fees.
Worksheet 2A				
1. Salaries (N) Service & Support Admin	\$ 3,343	\$ 32,121		To add back 2nd half MAC costs erroneously subtracted from WK 2A
		\$ (35,464)		To reclassify unposted 1st half MAC Costs for Hart
		\$ 7,932	\$ 7,932	To reclassify portion of 2nd Half MAC costs that should have come out of WK 9 for Hart vs WK 2A
2. Employee Benefits (N) Service & Support Admin	\$ 3,415	\$ (3,415)	\$ -	To reclassify unposted 1st half MAC Costs for Hart
Worksheet 6				
1. Salaries (I) Medicaid Admin	\$ 60,017	\$ 96,108	\$ 156,125	To report MAC claimable costs
1. Salaries (O) Non-Federal Reimbursable	\$ 45,168	\$ 88,145	\$ 133,313	To report MAC NFR costs
Worksheet 9				
1. Salaries (N) Service & Support Admin. Costs	\$ 342,842	\$ (66,341)		To reclassify unposted 1st half MAC Costs for Johnson to WK 6 and reclassify 2nd Half Mac costs erroneously subtracted from WK 2A
		\$ (8,834)		To reclassify unposted 1st half MAC Costs for Hart
		\$ (7,932)	\$ 259,736	To reclassify portion of 2nd Half MAC costs that should have come out of WK 9 for Hart vs WK 2A
Worksheet 10				
1. Salaries (E) Facility Based Services	\$ 424,523	\$ (1,040)	\$ 423,483	To reclassify CE salary and benefit costs for Jen Steele as a job coach without stats to NFR
1. Salaries (F) Enclave	\$ 86,951	\$ (213)	\$ 86,738	To reclassify CE salary and benefit costs for Jen Steele as a job coach without stats to NFR
4. Other Expenses (O) Non-Federal Reimbursable	\$ -	\$ 1,253	\$ 1,253	To reclassify CE salary and benefit costs for Jen Steele as a job coach without stats to NFR
Reconciliation to County Auditor Worksheet				
Expense:				
Less: Capital Costs	\$ (77,675)	\$ 16,200		To adjust depreciation.
		\$ (19,922)		To report loss on disposal of asset.
		\$ (3,465)		To adjust depreciation.
		\$ (35,296)		To report loss on disposal of asset.
		\$ (610)		To adjust depreciation.
		\$ (336)	\$ (121,104)	To adjust depreciation.
Less: Auditor/Treasurer Fees	\$ -	\$ (75,574)	\$ (75,574)	To adjust for tax settlement fees.
Revenue:				
Plus: Transfer to Fund 654	\$ -	\$ 509,976	\$ 509,976	To add as reconciling item Fund 654
Total from 12/31 County Auditor's Report	\$ 4,994,906	\$ 442,156	\$ 5,437,062	To correct County Auditor total
Medicaid Administration Worksheet				
Lines 6 -10 Ancillary Costs	\$ -	\$ 7,866	\$ 7,866	To report ancillary costs

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Dave Yost • Auditor of State

CLINTON COUNTY BOARD OF DEVELOPMENTAL DISABILITIES

CLINTON COUNTY

CLERK'S CERTIFICATION

This is a true and correct copy of the report which is required to be filed in the Office of the Auditor of State pursuant to Section 117.26, Revised Code, and which is filed in Columbus, Ohio.

Susan Babbitt

CLERK OF THE BUREAU

**CERTIFIED
MAY 9, 2013**