



Dave Yost • Auditor of State

**GRACEWORKS ENHANCED LIVING DBA VALLEY HOUSE
HAMILTON COUNTY**

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Independent Auditor's Report on Applying Agreed-Upon Procedures

Mr. Chris Carson, Bureau Chief
Bureau of Audit Performance
Ohio Department of Medicaid
50 West Town Street, 5th Floor
Columbus, Ohio 43215

Dear Mr. Carson:

As required by Ohio Rev. Code § 5111.27 and Ohio Admin. Code § 5101:3-3-20, the Auditor of State's Office performed the procedures enumerated below to which the Ohio Department of Medicaid (ODM) also agreed. These procedures are designed to assist you in evaluating whether Graceworks Enhanced Living dba Valley House (hereafter referred to as the Provider) prepared its JFS 02524 ICF-MR Medicaid Cost Report (Cost Report) for the period January 1, 2011 through December 31, 2011 in accordance with the Medicaid cost report instructions and the Appendix to Ohio Admin. Code § 5101:3-3-71.1 (cost report instructions) and to assist you in evaluating whether reported transactions complied with CMS Publication 15-1 (Provider Reimbursement Manual), and other compliance requirements described in the procedures below. Note that all rules and code sections relied upon in this report were those in effect during the Cost Report period and may be different from those currently in effect. Gracework's management is responsible for preparing the Cost Report. This agreed-upon procedures engagement was conducted in accordance with the American Institute of Certified Public Accountants' attestation standards. The sufficiency of these procedures is solely the responsibility of ODM. 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.

Occupancy and Usage

1. ODM requested us to report variances if the Provider's inpatient days were greater than those reported on *Schedule A-1, Summary of Inpatient Days*.

We compared the Provider's number of inpatient days for Medicaid and Non-Medicaid patients on the Total Billable Days & IP Days 2011 report to those reported on *Schedule A-1*. We also footed the reports for accuracy.

We found no computational errors or variances where inpatient days were greater than reported.

2. ODM requested us to report variances if total Medicaid inpatient days and total inpatient days were greater than those reported on *Schedule A-1, Summary of Inpatient Days* for one month.

We compared the Medicaid inpatient days and total inpatient days reported on *Schedule A-1* for December 2011 with the total of all EOM reports for Medicaid inpatient days and total inpatient days. We also footed the reports for accuracy.

We found no computational errors or variances where inpatient days were greater than reported for the month.

Occupancy and Usage (Continued)

3. ODM requested us to report variances to *Schedule A-1, Summary of Inpatient Days* if total inpatient days were greater than those reported for one month.

We haphazardly selected three individual resident medical records (10 percent) and compared the total days the resident was in the Provider's care for December 2011 with the total inpatient days reported on the EOM reports and *Schedule A-1*. For the selected individuals we also determined if the Provider included any waiver respite days as Medicaid or Medicare days, and if bed hold days in excess of 30 in a calendar year received the proper authorization on form JFS 09402 in accordance with Ohio Admin. Code § 5101:3-3-16.8.

We found no variances where inpatient days were greater than reported for the month and no misclassified waiver respite days or unauthorized bed hold days.

4. ODM requested us to report variances if the Provider had reimbursed Medicaid days in excess of total Medicaid days reported on *Schedule A-1, Summary of Inpatient Days*.

We compared the number of reimbursed Medicaid days per the Medicaid Information Technology System (MITS) with the total Medicaid days reported on *Schedule A-1*.

We found that total Medicaid days reported exceeded Medicaid reimbursed days per MITS.

Medicaid Paid Claims

1. ODM requested that we select paid claims for three residents in one month and report any variances if the claims did not meet the applicable documentation requirements.

We haphazardly selected three residents and obtained all of the paid claims from MITS for the month of December 2011 for two residents and the month of October 2011 for one resident and compared the reimbursed Medicaid days to the days documented per the resident's medical records. We determined if the Provider's documentation met the general requirements of CMS Publication 15-1, Chapter 23, and Ohio Admin. Code § 5101:3-3-20 and if the days billed met the specific requirements of Ohio Admin. Code § 5101:3-3-16.8 (C) to (E) as an occupied or bed hold day and Ohio Admin. Code § 5101:3-3-39 for the payment adjustment requirements for resident's discharge, admittance to hospital, death or election to receive hospice care.

We found no instances of non-compliance with these documentation requirements.

Non-Payroll Expenses

1. ODM requested that we compare the Provider's non-payroll expenses to the amounts reported on *Schedule B-1, Other Protected Costs; Schedule B-2, Direct Care Cost Center; and Schedule C, Indirect Care Cost Center* and report reclassifications between schedules and adjustments resulting in decreased costs exceeding five percent of non-payroll expenses on any schedule.

We compared all non-payroll expenses reported on *Schedule B-1, Schedule B-2, and Schedule C* to the Provider's Historical Detailed Trial Balance For 2011 and Allocation of Central Office Costs 01/01/11-12/31/11 reports.

We found no differences exceeding five percent on any one schedule.

Non-Payroll Expenses (Continued)

2. ODM requested that we select a sample of 20 non-payroll expenses reported on *Schedule B-1, Other Protected Costs; B-2, Direct Care Cost Center; Schedule C, Indirect Cost Center; and Exhibit 3, Home Office Trial Balance* and report expenses exceeding \$500 which lacked supporting documentation, were not properly allocated or were unallowable.

We selected 20 non-payroll expenses in total from the non-payroll accounts on *Schedule B-1, B-2, Schedule C* and *Exhibit 3*. We reviewed these expenses to determine if they had supporting documentation, were properly allocated and classified, and were allowable expenses per the cost report instructions, Ohio Admin. Code § 5101:3, and CMS Publication 15-1.

We found an item requiring adjustment as reported in Appendix A.

3. ODM requested that we review the allocation methodology used in the Provider's Home Office Trial Balance allocating costs on *Schedule B-1, Other Protected Costs; Schedule B-2, Direct Care Cost Center; Schedule C, Indirect Care Cost Center*, and equity on *Schedule E-1, Return on Equity Capital of Proprietary Providers*, determine if it was reasonable, allowable, related to residential care, and properly classified in accordance with Ohio Admin Code § 5101:3, CMS Publications 15-1 Section 2150, and the cost report instructions, and report any reclassifications between schedules and adjustments resulting in decreased Home Office Costs on any schedule.

We reviewed the allocation methodology used in the Provider's Allocation of Central Office Costs 01/0111-12/31/11 report allocating costs on *Schedule B-1, Schedule B-2, Schedule C*, and equity on *Schedule E-1* to determine whether it was reasonable, allowable, related to residential care, and properly classified in accordance with Ohio Admin. Code § 5101:3, CMS Publication 15-1 Section 2150, and the cost report instructions.

We found no differences resulting in decreased costs on any schedule.

We noted that the Provider allocated Home Office Costs on *Schedules B-1, B-2 and C* based on a combination of revenues and inpatient days rather than the allocation methodology required per CMS Publication 15-1 Section 2150 which states in pertinent part, "for home office account periods beginning on or after January 1, 1983: Pooled home office costs must be allocated to chain components on the basis of total costs if the chain is composed of either unlike health care facilities".

Recommendation:

We recommend the Provider implement allocation methodology required by CMS and allocate pooled Home Office expenses based on total expenses.

4. ODM requested that we scan the Provider's non-payroll expenses reported on *Schedule B-1, Other Protected Costs; Schedule B-2, Direct Care Cost Center; and Schedule C, Indirect Cost Center* for non-federal reimbursable costs or costs not properly classified exceeding \$500 or contractor costs over \$10,000 that should have been reported on *Schedule C-3, Costs of Service from Related Parties*.

Non-Payroll Expenses (Continued)

We scanned the Provider's Historical Detailed Trial Balance for 2011 for non-payroll expenses reported on *Schedule B-1, Schedule B-2, and Schedule C* for non-federal reimbursable costs or costs not classified in accordance with Ohio Admin. Code § 5101:3, CMS Publication 15-1, or the cost report instructions exceeding \$500. We also scanned for any contractors with costs over \$10,000 which would require reporting on *Schedule C-3*.

We found no differences exceeding \$500. We found no contracts over \$10,000 which should be reported on *Schedule C-2*.

5. ODM requested that we compare the 2011 non-payroll costs reported on *Schedule B-1, Other Protected Costs; Schedule B-2, Direct Care Cost Center and Schedule C, Indirect Cost Care Center* by chart of account code to non-payroll costs reported by chart of account code in 2010 and obtain the Provider's explanation for non-payroll variances that increased by more than five percent and \$500 from the prior year's schedules and report adjustments exceeding \$500 and five percent of non-payroll costs on any schedule.

We compared the 2011 non-payroll costs reported on *Schedule B-1, Schedule B-2, and Schedule C* by chart of account code to non-payroll costs reported by chart of account code in 2010 and obtained the Provider's explanation for five non-payroll variances that increased by more than five percent from the prior year's schedules.

We obtained the Provider's explanation that the increase in Medical Supplies - Medicare Non Billable was due to a misclassified dental expense and necessary repair to a resident's hearing aide; Psychologist increase was due to contract services which were not performed in the prior year; Enterals: Medicare Non Billable was due to increase in necessary additional prescribed food supplements and increases in Consulting and Management Fees -Indirect and Employee Fringe Benefits - Indirect Care were due to an increase in the Home Office allocation.

We reported variances in Appendix A for the misclassified dental expense.

Property

1. ODM requested we compare the Provider's procedures regarding capitalization of fixed assets used to prepare *Schedule D, Capital Cost Center; Schedule D-1, Analysis of Property, Plant and Equipment; and Schedule D-2, Capital Additions/Deletions* with the cost report instructions and CMS Publication 15-1, and report any variances.

We compared the Provider's procedures regarding capitalization of fixed assets used for preparing *Schedule D, Schedule D-1, and Schedule D-2* with the cost report instructions and CMS Publication 15-1.

We noted one inconsistency between the Provider's capitalization policy and the guidelines in that the Provider does not determine a salvage value when calculating depreciation as required by CMS Publication 15-1, 104.19, which states in pertinent part, "virtually all assets have a salvage value substantial enough to be included in calculating depreciation, and only in the rare instance is salvage value so negligible that it may be ignored".

Property (Continued)

Recommendation:

We recommend the Provider calculate a salvage value equal to 10 percent of historical cost when determining the initial net book value to be depreciated for each new capital asset purchase.

2. ODM requested that we compare capital assets and corresponding depreciation listed on *Schedule D, Capital Cost Center; Schedule D-1, Analysis of Property, Plant and Equipment; and Schedule D-2, Capital Additions/Deletions* to the Provider's Depreciation Schedule and Book Asset Detail Report and report differences exceeding \$500.

We compared capital assets and corresponding depreciation listed on *Schedule D, Schedule D-1, and Schedule D-2* to the Provider's Depreciation Listing.

We found no differences exceeding \$500.

3. ODM requested that we select a total of three additions, renovations and/or deletions reported on *Schedule D-1, Analysis of Property, Plant and Equipment and Schedule D-2, Capital Additions/Deletions* and determine if the cost basis, useful life and depreciation expense were in accordance with the cost report instructions and Ohio Admin. Code § 5101:3-3-01 (BB) and report any differences.

We selected three additions, renovations and deletions reported on *Schedule D-1* and reviewed the cost basis, useful life and depreciation expense to determine whether they were in accordance with the cost report instructions and Ohio Admin. Code § 5101:3-3-01(BB). We also reviewed the assets used in residential care to determine if they should be reclassified as the Costs of Ownership in accordance with Ohio Admin. Code § 5101:3 and CMS Publication 15-1.

We found no differences exceeding \$500.

4. ODM requested we review the rent and lease agreements to determine if any related party lease costs were recorded in accordance Ohio Admin. Code §§ 5101:3-3-01(BB) and 5101:3-3-84.3, and that non-related party leases meet the requirements of FASB 13, if costs were recorded in *Schedule D, Analysis of Property, Plant and Equipment* in Lease and Rent Accounts 8060 or 8065, and report any differences.

We reviewed the rent and lease agreements and identified related party rental payments that are unallowable per CMS publication 15-1, 1011.5; however, since the rental payments were less than the ownership costs, we will not propose an adjustment to the Cost Report.

Recommendation:

We recommend the Provider record building costs leased from a related organization in compliance with CMS Publication 15-1, 1011.5, "...In such case, the rent paid to the lessor by the provider is not allowable as cost. The provider, however, would include in its costs the costs of ownership".

Property (Continued)

5. ODM requested we compare the renovation costs and financing costs in the Non-extensive Renovation Letter to *Schedule D-1, Analysis of Property, Plant and Equipment*, if costs were recorded in *Schedule E, Balance Sheet*, Account 1300, Renovations, and report any differences.

We did not perform this procedure as there were no expenses reported on *Schedule E, Balance Sheet*, Account 1300, Renovations.

6. ODM requested we review the fixed asset/depreciation listing to ensure transportation expenses were reasonable, allowable and related to patient care as defined in CMS Publication 15-1. ODM also requested we review the W-2s to determine if any corporate officers and owners who exclusively used vehicles reported additional compensation or were adjusted from allowable expenses pursuant to CMS Publication 15-1, Chapter 9, if transportation costs are recorded in *Schedule D-1, Analysis of Property, Plant and Equipment*, and report any differences.

We did not perform procedure as there was no transportation costs recorded on *Schedule D-1*.

Payroll

1. ODM requested that we compare the Provider's payroll expenses to the amounts reported on *Schedule B-1, Other Protected Costs; Schedule B-2, Direct Care Cost Center; Schedule C, Indirect Cost Care Center; Schedule C-1, Administrator's Compensation; and Schedule C-2, Owner's Relatives Compensation* and report reclassifications between schedules and adjustments resulting in decreased costs or hours exceeding five percent on any schedule.

We compared all salary, fringe benefits and payroll tax entries and hours worked reported on *Schedule B-2, Schedule C, and Schedule C-1* to the Historical Detailed Trial Balance For 2011 and other supporting documentation to identify variances exceeding five percent of total payroll costs or hours reported on any schedule. There were no entries on *Schedule B-1* or *Schedule C-2*.

We found no differences exceeding five percent.

2. ODM requested that we select a sample of five employees reported on *Schedule B-1, Other Protected Costs; Schedule B-2, Direct Care Cost Center; Schedule C, Indirect Cost Center; and Exhibit 3, Home Office Trial Balance* and determine if any salaries and fringe benefit expenses exceeding \$500 were not properly allocated and classified, or were unallowable.

We selected five employees (including all Administrators and Owners) and compared the Provider's job descriptions to the schedule in which each employee's salary and fringe benefit expenses were reported to determine if they were allowable under CMS Publication 15-1, were properly classified, allocated and allowable in accordance with Ohio Admin. Code § 5101:3, CMS Publication 15-1, Chapter 9 and Section 2150 and the cost report instructions to identify variances exceeding \$500.

We found no differences.

Payroll (Continued)

3. ODM requested that we compare the 2011 payroll costs reported on *Schedule B-1, Other Protected Costs; Schedule B-2, Direct Care Cost Center; Schedule C, Indirect Cost Care Center; Schedule C-1, Administrator's Compensation; and Schedule C-2, Owner's Relatives Compensation* by chart of account code to payroll costs reported by chart of account code in

2010 and obtained the Provider's explanation for five payroll variances that increased by more than five percent from the prior year's schedules and report adjustments exceeding \$500 and five percent of payroll costs on any schedule.

We compared the 2011 payroll costs reported on *Schedule B-2, Schedule C, and Schedule C-1* by chart of account code to payroll costs reported by chart of account code in 2010 and found five payroll variances that increased by more than five percent and \$500 from the prior year's schedules. There were no entries on *Schedule B-1 or Schedule C-2*.

We obtained the Provider's explanation that the increase in Licenses Practical Nurse salary was due to an increase in pay rates and hours and the increases in Food Service Supervisor, Dietary Personnel, Other Administrative Personnel and Housekeeping were due to changes in how home office and indirect time were allocated.

We reported no variances.

Revenue

1. ODM requested us to compare all revenues on the Provider's Revenue Ledger with those revenues reported on *Attachment 1, Revenue Trial Balance* and report differences exceeding five percent of total revenues reported.

We compared all revenues on the Provider's Historical Detailed Trial Balance For 2011 and Allocation of Central Office Costs 01/01/11-12/31/11 reports with those revenues reported on *Attachment 1, Revenue Trial Balance* to determine if all revenues were reported in accordance with Ohio Admin. Code § 5101:3, CMS Publication 15-1, and the cost report instructions.

We found no differences exceeding five percent.

2. ODM requested we scan the Provider's Revenue Ledger to identify any revenue offset/applicable credits exceeding \$500 which the provider did not record on *Attachment 2, Adjustments to Trial Balance* or were not offset against expenses on *Schedule B-1, Other Protected Costs; Schedule B-2, Direct Care Cost Center; and Schedule C, Indirect Cost Care Center*.

We scanned the Provider's Historical Detailed Trial Balance For 2011 and Allocation of Central Office Costs 01/01/11-12/31/11 reports to identify any revenue offsets or applicable credits which were not reported on *Attachment 2 or Schedules B-1, B-2 or C* to offset corresponding expenses in accordance with CMS Publication 15-1, Chapters 1, 6 and 8.

We did not identify any unrecorded revenue offsets or applicable credits exceeding \$500 that would offset corresponding expenses.

Assets, Liabilities and Owner's Equity

ODM requested us to perform procedures 1 through 6 below if the Provider was a for-profit provider and if *Schedule E-1, Return on Equity Capital of Proprietary Providers* reported equity above zero.

1. ODM requested we compare Assets and Liabilities on the *Schedule E, Balance Sheet* with the Provider's Trial Balance report and other supporting documentation for those accounts greater than five percent of total reported assets or liabilities, and identify any supported, unallowable or improperly classified amount per Ohio Admin. Code § 5101:3, CMS Publication 15-1, or the cost report instructions.

We did not perform this procedure as the Provider indicated on *Schedule A* that it is a non-profit corporation.

2. ODM requested we determine if the Provider is on a proper accrual basis and if their accrual policies are applied consistently between periods as required by the cost report instructions, and report any differences.

We did not perform this procedure as the Provider indicated on *Schedule A* that it is a non-profit corporation.

3. ODM requested we compare the Provider's ending account balance with beginning balance for all accounts on *Schedule E, Balance Sheet* and obtain an explanation for any account ending balance with variances exceeding 25 percent or \$100,000 of the beginning balance, and report any differences.

We did not perform this procedure as the Provider indicated on *Schedule A* that it is a non-profit corporation.

4. ODM requested we compare the savings account balance on the Trial Balance report to *Schedule E, Balance Sheet* to determine if total cash on hand from investments/savings exceeds three months of the Provider's total annual operating expenses as reported *Schedule A-3, Summary of Costs* and is not allowable equity as Invested Funds, pursuant to CMS Pub. 15-1, Section 1218.2, and report any differences.

We did not perform this procedure as the Provider indicated on *Schedule A* that it is a non-profit corporation.

5. ODM requested we compare reconciling items on the bank reconciliation report/schedule with the December 2011 bank statement and trial balance report, and report any differences.

We did not perform this procedure as the Provider indicated on *Schedule A* that it is a non-profit corporation.

6. ODM requested we compare amounts reported on *Schedule E-1, Return on Equity Capital of Proprietary Providers* to supporting documentation to ensure net equity calculations for Capital, Due from Owners/Officers, Related Party Loans, Equity in Assets Leased from Related Parties, or Home Office Equity were in accordance with CMS Publication 15-1 and Ohio Admin. Code § 5101:3-3-01(BB), and report any differences.

We did not perform this procedure as the Provider indicated on *Schedule A* that it's a non-profit corporation.

We did not receive a response from the 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 Provider's Cost Report. 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 Provider, the Ohio Department of Medicaid, 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.

A handwritten signature in black ink that reads "Dave Yost". The signature is written in a cursive, flowing style.

Dave Yost
Auditor of State

November 3, 2014

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Appendix A
Graceworks Enhanced Living - Valley Home
Intermediate Care Facility
2011 Income and Expenditure Report Adjustments

	Reported Amount	Correction	Corrected Amount	Explanation of Correction
Schedule B-1 Other Protected Costs				
2. Medical Supplies - medicare non billable - 6001 - Other/Contract Wages (2)	\$ 3,883	\$ (722)	\$ 3,161	To reclassify dental expenses
Schedule B-2 Direct Care Cost Center				
21. Consulting and Management Fees-Direct Care - 6210 - Other/Contract Wages (2)	\$ 5,874	\$ (2,350)	\$ 3,524	To reclassify indirect costs
Schedule C Indirect Care Cost Center				
28. Consulting and Management Fees - Indirect - 7215 - Other/Contract Wages (2)	\$ 1,959	\$ 2,350	\$ 4,309	To reclassify indirect costs
68. Other Non-Reimbursable - Specify Below - 9725 - Other/Contract Wages (2)	\$ 284	\$ 722	\$ 1,006	To reclassify dental expenses

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GRACEWORKS ENHANCED LIVING DBA VALLEY HOUSE

HAMILTON 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
DECEMBER 18, 2014**