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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 Henry County Board of Developmental Disabilities (County Board) for the year ended December 31, 2023 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, 2023, 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, 2023, 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:

Targeted Case Management (TCM) and Service and Support Administration (SSA)

Statistics - Service and Support Administration (SSA)

- We footed the County Board's Cost Report B4 Detail reports 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 reports with the Cost Report. We found variances greater than two percent of total units on each row as reported in the Appendix.
- 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.
- 3. We inquired with the County Board if it tracked SSA general and administrative activities (general time units) as required by the Annual Summary of Units of Service Service and Support Administration and SSA Unit and Cost Reporting sections of the *Guide to Preparing Income and Expenditure Reports for use by County Boards of Developmental Disabilities* (Cost Report Guide).

Statistics - Service and Support Administration (SSA) (Continued)

The County Board provided a Cost Report B4 Detail report documenting fifteen-minute general time units. We calculated a SSA utilization rate of 60.58% using total general time, SSA Allowable, and SSA Unallowable 15-minute unit totals from the Cost Report and a final SSA utilization rate after adjustments of 61.10%.

We inquired with the County Board's management why the utilization rate was below 75%. We obtained an explanation that it was related to the number of general time units and some SSAs may have recorded lunches, paid time off (vacation and sick) and administrative task as general time and other activities included in the general time category were MUI review or provider support and time for non-TCM trainings. Moreover, the County Board stated that if these items would not have been documented as general time, the variance would not have been as great.

TCM Paid Claims Testing

- 1. We selected 100 Targeted Case Management (TCM) recipient dates of service and compared the County Board's service documentation to the allowable/ covered activities and documentation requirements listed in Ohio Admin. Code 5160-48-01 (D) and (F) and the Cost Report Instructions. We found no noncompliance with the documented activity or service documentation requirements.
- 2. 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.

SSA Additional Procedures

1. We received an SSA listing from the County Board of all first line SSAs and first line SSA Supervisors and their respective salaries, benefits, hours and full time equivalent (FTE) percentages. We compared the SSA Listing to the Financial and Cost Report B4 Detail reports and to the Salary Breakdown report of the Northwest Ohio Waiver Administration Council (COG). We found the Cost Report B4 Detail reports included SSA units for one COG employee; however, the SSA Listing did not include the COG employee's salaries and benefits. Therefore, we added the salaries, benefits and corresponding FTEs for the one COG employee from the COG's Salary Breakdown report to the SSA Listing.

We calculated the expected first line SSA and first line SSA supervisor salary and benefit costs based on the hours and FTE percentages on the SSA Listing. We compared the calculated SSA salaries and benefits to the reported costs on the *Service and Support Administration form* of the Cost Report and found the calculated first line SSA and first line SSA supervisor costs were less than the actual costs.

We inquired with the County Board's management and obtained an explanation that the variance was because of overtime cost discrepancy in June. We also noted the variance was related to Medicaid Administrative Claiming (MAC) costs not backed out of the calculated SSA costs on the SSA Listing and SSA costs on the Service and Support Administration form including salaries and benefits for an SSA file clerk.

- 2. We scanned the financial reports and inquired of management if there were any paid contingencybased bonuses for SSA utilization and found none.
- 3. We found 10 SSAs and one SSA supervisor listed on the SSA Listing. We calculated 9.08 full-time equivalent (FTE) first line SSAs and one FTE first line SSA supervisor and an initial and final ratio of 9.08 first line SSAs to first line SSA Supervisors from the adjusted Salary Listing.
- 4. We found 842 individuals served listed on DODD's Individual's served report. We calculated an initial and final ratio of 92.72 individuals served to first line SSA FTEs and an initial and final ratio of 842 individuals served to first line SSA supervisor FTEs.

SSA Payroll Testing

As part of the procedures under the Payroll Expenditures section, we found no adjustments specific to the *Service and Support Administration form* of the Cost Report.

SSA Non-Payroll Expenditures

As part of the procedures under the Non-Payroll Expenditures section, we reclassified \$11,934 in COG costs from the Service and Support Administration form to the Reconciliation form in accordance with the Cost Report Instructions.

TCM Unit Rate Procedure

- 1. We calculated a TCM unit rate of \$24.23 per 15-minute unit from final SSA expenditures on the *Service* and *Support Administration form* and from final SSA Allowable units and SSA Unallowable units on the *Annual Summary of Units of Service Service and Support Administration form* and General Time units from the Cost Report B4 Detail reports. We compared the calculated TCM unit rate to actual TCM unit rate of \$47.51 provided by DODD and we inquired with County Board's management because the actual TCM unit rate was over five dollars more per unit than the calculated TCM unit rate.
 - We obtained an explanation from the County Board that the additional General time units is the main cause of this variance. Additionally, SSA's documented all their time in the past and some of the tasks or duties that were documented were not able to be reported as TCM units.
- 2. We calculated a TCM unit rate of \$11.27 per 15-minute unit from the SSA Listing of first line SSA and first line SSA supervisor salaries, benefits, and hours prepared by the County Board and from adding an estimate of 15% for overhead costs. We compared the calculated TCM unit rate to actual TCM unit rate of \$47.51 provided by DODD and we inquired with County Board's management because the actual TCM unit rate was over five dollars more per unit than the calculated TCM unit rate.

We obtained an explanation that the County Board had a few people come and go from the SSA department during 2023 with resignations and new hires. Moreover, the County Board explained they have a tenured staff and staff that completes tasks that are not completely SSA related.

Allocation Statistics - Square Footage

We confirmed through inquiry with the County Board and by scanning the Summary by Service Code report that it did not render any paid Medicaid waiver services for only a portion of calendar year 2023.

Allocation Statistics - Attendance

We scanned the Summary by Service Code report for the period January 1, 2023, through December 31, 2023, and found no paid adult program waiver services.

Allocation Statistics - Transportation

We scanned the Summary by Service Code report for the period January 1, 2023, through December 31, 2023, and found no paid waiver transportation services.

Adult and Non-Medical Transportation Paid Claims Testing

We scanned the Summary by Service Code report and confirmed that the County Board provided neither adult program nor non-medical waiver transportation services.

Non-Payroll Expenditures

- 1. We traced non-payroll expenditures on the Financials and Other Vehicle Transportation reports to the *Indirect Cost Allocation*, *Service and Support Administration* and *Adult Program* forms. We found no variances.
- 2. We selected 60 non-payroll disbursements from the service contracts and other expenses from cost categories that contributed to Medicaid rates. We compared the County Board's supporting documentation to the Cost Report and 2 C.F.R. §§ 200.420-475. There were unreported reconciliation costs and non-federal reimbursable costs. For any errors, we scanned the Financials report for other like errors in the same cost center. We found additional similar errors and totaled all identified errors as reported in the Appendix.
- 3. We confirmed that the County Board maintained Revenue and Expense reports and a reconciliation for one month in each quarter that it performed monthly income and expense reconciliations in accordance with Ohio Admin. Code 5123-4-01(O)(2).
- 4. We scanned the Summary by Service Code report for the period January 1, 2023, through December 31, 2023, and found no paid waiver adult program services.

Payroll Expenditures

- 1. We compared the salaries and benefit costs on the Financials reports to the amounts reported on the *Indirect Cost Allocation* and *Service and Support Administration forms*. There were no variances.
- 2. We selected six employees from the Financials and Staff Roster reports from cost categories that contribute to Medicaid rates. For the employees selected, we compared the organizational chart, Staff Roster, Financials, Cost Report B4 Detail reports, 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. The misclassification errors in procedure 2 were greater than 10 percent, and we scanned the Financials reports and Staff Roster and compared the classification of employees to entries on the Cost Report worksheets/forms and Cost Report Guide to identify similar errors. There were no additional variances.
- 4. We confirmed through inquiry with the County Board that it had shared personnel costs with Fulton County Board for a Children Services Director. We noted that the employee was employed by Fulton County Board and that Henry County Board was invoiced for services rendered. We noted these costs are reported on the *Direct Services form* and are not in the cost category that contributes to Medicaid rates.

Medicaid Administrative Claiming (MAC)

1. We compared the actual salaries and benefits for the Random Moment Time Study (RMTS) participants for the second quarter from the Financial reports to the salaries and benefits submitted on the MAC Costs by Individual Report. We initially found that MAC reimbursed salaries and benefits exceeded actual salaries and benefits by more than one percent. We communicated the variance to Henry County Board. The County Board sent a revised Financials report and explained that the Ohio Public Employment Retirement System withholdings are paid one month in arrears. We reperformed the comparison with the revised Financials report and found actual salaries and benefits for the second quarter exceeded MAC reimbursed salaries and benefits.

Moreover, Henry County Board communicated that MAC costs were overreported on the MAC Costs by Individual report for the first quarter. We compared the actual salaries and benefits for the RMTS

participants for the first quarter from the revised Financial reports to the salaries and benefits submitted on the MAC Costs by Individual Report.

Medicaid Administrative Claiming (Continued)

We confirmed that MAC reimbursed salaries and benefits exceeded actual salaries and benefits by more than one percent. We communicated this variance to the Department and received a revised MAC Costs by Individual report for the first quarter. We compared the original MAC Costs by Individual report to the revised report and reported variances in the Appendix for the *Medicaid Administration* and *Indirect Cost Allocation forms*.

2. For the nine moments selected by the Department, we obtained copies of the entries in the RMTS web-based program (RMTS Screenshot). 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. We found no variances.

Unit Rate

For the Supported Employment - Enclave (Acuity A), Supported Employment - Community Employment and Targeted Case Management rates identified unit rates identified by the Department on the Comprehensive Cost Report Rate sheet, we used the CBCR notes and any Department Desk Review notations and inquired with County Board management regarding omissions or misreporting of costs or statistics, new contracts, and changes due to privatization which impact the unit rates.

The County Board indicated it was not aware of anything that might impact the identified unit rates.

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 Ohio Auditor of State

Tiffany L Ridenbaugh, CPA, CFE, CGFM

Chief Deputy Auditor

July 21, 2025

Appendix Henry County Board of Developmental Disabilities 2023 Cost Report Adjustments

	Reported Amount	Correction	Corrected Amount	Explanation of Correction						
Annual Summary of Units of Service - Service and Support Administration										
TCM Units, CB Activity Other SSA Allowable Units, CB Activity	18,643	561	19,204	To correctly report SSA units						
	4,098	(364)	3,734	To correctly report SSA units						
SSA Unallowable Units, CB Activity	2,883	(191)	2,692	To correctly report SSA units						
Indirect Cost Allocation										
Salaries, Gen Expense All Program	\$ 203,398	\$ (56,723)		To reclassify Community Relations/ Employment First Manager salary						
		\$ (47,956)		To reclassify Community Relations Coordinator salary						
		\$ 5,071	\$ 103,790	To reclassify first quarter salaries due to MAC error						
Employee Benefits, Gen Expense All Program	\$ 200,556	\$ (31,695)		To reclassify Community Relations/ Employment First Manager benefits						
		\$ (30,699)	\$ 138,162	To reclassify Community Relations Coordinator benefits						
Other Expenses, Non-Federal Reimbursable	\$ 27,801	\$ 124	\$ 27,925	To reclassify sponsorship costs						
Other Expenses, Gen Expense All Program	\$ 151,042	\$ (124)	\$ 150,918	To reclassify sponsorship costs						
Direct Services										
Salaries, Community Residential	\$ 63,614	\$ 47,956	\$ 111,570	To reclassify Community Relations Coordinator salary						
Employee Benefits, Community Residential	\$ 22,859	\$ 30,699	\$ 53,558	To reclassify Community Relations Coordinator benefits						
Medicaid Administartive										
Salaries, Medicaid Admin	\$ 265,828	\$ (3,810)	\$ 262,018	To reclassify first quarter						
Salaries, Non-Federal Reimbursable	\$ 90,447	\$ (1,261)	\$ 89,186	salaries due to MAC error To reclassify first quarter salaries due to MAC error						
Services and Support Admin										
Service Contracts, Service & Support Admin Costs	\$ 8,446	\$ (8,411)	\$ 35	To reclassify COG expenses						
Other Expenses, Service & Support Admin Costs	\$ 24,283	\$ (3,523)	\$ 20,760	To reclassify COG expenses						

Appendix Henry County Board of Developmental Disabilities 2023 Cost Report Adjustments

	Reported Amount		Correction		Corrected Amount		Explanation of Correction
Adult Program							
Salaries, Unassign Adult Program	\$	-	\$	56,723	\$	56,723	To reclassify Community Relations/Employment First Manager salary
Employee Benefits, Unassign Adult Program	\$	-	\$	31,695	\$	31,695	To reclassify Community Relations/Employment First Manager benefits
CBCR Reconcile CBCR Reconcile Expenses, Fees Paid to COG	\$	-	\$	8,411			To reclassify COG expenses
			\$	3,523	\$	11,934	To reclassify COG expenses



HENRY COUNTY BOARD OF DEVELOPMENTAL DISABILITIES

HENRY 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 9/4/2025

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