

#### Hello Everyone:)

My name is Ryan Meanor and I work as a Management Analyst Supervisor in the Bureau of Fiscal Accountability in the Office of Families and Children and my primary work responsibility is Title IV-E cost reports. My immediate supervisor is Charlotte Gerhardstein and both of us work directly under the bureau's Budget Coordinator, Dan Shook. My topic today is "Title IV-E Interim Period Cost Report Process." Today's material is a presentation and discussion on interim period cost reports. It is precisely what a new agency would file with us to establish their initial Title IV-E reimbursement ceilings. This material will be an overview of the filing requirements for an interim period cost report.



### **Purpose of the Cost Report**

- It serves to establish a measurable means of reasonableness (i.e., ceiling) for the federal government's participation in the cost of placement care for Title IV-E eligible children.
- It is utilized in calculating the county's financial reimbursement for eligible placements.

2

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A county can pay as much as it wants for the care of a child...however, the federal gov't will only participate up to the point of the provider's cost of doing business...which is established via the cost report. The cost report is an objective, verifiable means of establishing a provider's cost of doing business. The county's payment is submitted to ODJFS and gets bumped up against the provider's IV-E ceilings and a reimbursement is generated at the applicable FFP% on the lower of the county's payment or the IV-E ceiling.



# Who is Required to Complete the Cost Report?

- Any public agency or private agency (includes not-for-profit and for-profit) which provides foster care and/or residential services. This generally covers the following types of agencies:
  - Private Child Placing Agency (PCPA)
  - Private Non-Custodial Agency (PNA)
  - Public Children Services Agency (PCSA)
  - Juvenile Courts

3

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Office of Families and Children

# Is Completion/Filing of the Cost Report Mandatory?

- No, it is voluntary; it is essentially a business decision.
- However, there is a financial incentive to file a cost report.
  - Child placement by the county often hinges upon an agency's Title IV-E reimbursable status.
  - To be designated as Title IV-E reimbursable, the Ohio Revised Code and the Ohio Administrative Code require submission and approval of a completed cost report.

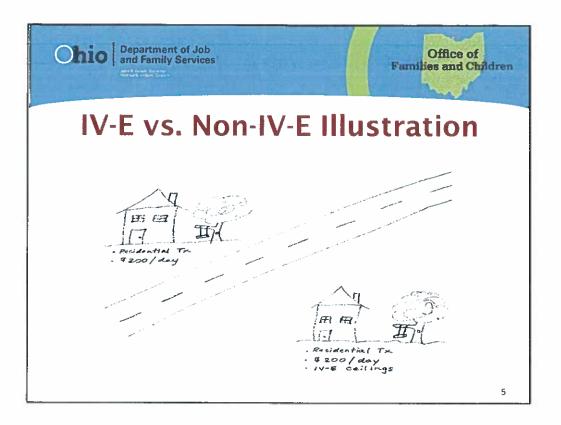
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Is completion/filing of the interim period cost report mandatory? No. Unlike filing your federal taxes, filing a cost report is not mandatory. The choice to complete/file the cost report is optional. It's really a business decision, a cost/benefit issue. And some out-of-state providers don't file a cost report because they have very few children from Ohio.

However, there's a financial incentive to file. Counties generally will seek an agency with a IV-E reimbursable program. And who can blame them? Such settings are financially attractive.

In order to be designated as Title IV-E reimbursable, both the Ohio Revised Code and the Ohio Administrative Code require submission and approval of a completed cost report.

Let's look at a simple illustration on the next slide of 2 group homes.



Counties and courts have many placement options. On this city street in Anytown, USA, there appears to be similar sites with similar programs offered for the same daily rate. But what's different? As you can see, one of them is IV-E approved...a cost report was completed, filed, approved and Title IV-E reimbursement ceilings established.

So, given these circumstances, which one would the county choose? You guessed it...most likely the IV-E reimbursable site...less local dollars will be used because part of the \$200 that was spent for care will be reimbursed. About 60%, or \$120, of the \$200 would be reimbursed to county or court. The county's net out-of-pocket expense would be approximately \$80.

Therefore, that's why county contracts will likely include a provision requiring the private agency to seek Title IV-E reimbursement ceilings.

So, if I'm the county, I'm taking a right-hand turn off Main Street and signing a contract with the Title IV-E reimbursable site.





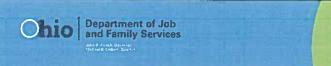
## Interim Cost Report Period and Effective Ceilings Period

- Standard cost report period is the state fiscal year (SFY) of July 1 through June 30. It is due by the following December 31. Approved Title IV-E reimbursement ceilings are effective beginning the following April 1 through March 31.
- Interim cost report period is any non-standard period; must cover a minimum of ninety (90) days and include at least the initial date of placement. There is no due date; however, the sooner it's submitted, the sooner it can be processed. Approved Title IV-E reimbursement ceilings are effective from date of initial placement through at least the following March 31 and in some instances for an additional year afterwards.

6

The standard reporting period is the state fiscal year of July 1 through June 30 and the approved ceilings for this period begins the following April 1 through March 31.

Interim cost reports are any non-standard period. It depends entirely on the licensure date and the initial placement date. Ceilings are effective from the date of initial placement; the end date of the effective period is March 31 and depending on the reporting period could be nearly two years in length. Generally, no inflation factor is incorporated into the ceilings because the interim reporting period is outside of the standard reporting period.



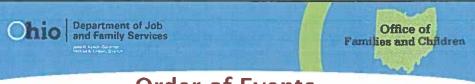


### Negotiated Title IV-E Reimbursement Ceilings

- Due to excessive startup costs or low census count, a negotiation of the approved Title IV-E reimbursement ceilings may occur in order to utilize amounts that are more in line with the agency's daily per diem charge to the counties/courts.
- This creates less financial exposure for the federal government.

7

Generally, the program's incurred costs are divided by the actual census days experienced during the reporting period to calculate the Title IV-E reimbursement ceilings. But in some scenarios large startup costs or low census can result in excessive ceiling amounts. So, in order to produce more realistic ceilings and to act in a fiscally conservative manner as steward of the federal government's Title IV-E program here in Ohio, we will utilize a negotiated census count in order to produce ceiling amounts that are more in line with the agency's current daily per diem rate charge. This offers less financial exposure for the federal government.



### Order of Events - Interim Period Cost Reporting

- Agency must obtain appropriate licensure.
- 2. Agency must have a least one child placement.
- 3. Agency must complete a cost report which reflects cost and census data for a minimum ninety (90) day period.
- 4. Agency must submit interim period cost report, backup documentation, and other required items to OFC.
- 5. OFC reviews submitted material and calculates final approved Title IV-E reimbursement ceilings.
- 6. OFC emails approval letter and Title IV-E reimbursement ceilings calculation spreadsheet.
- OFC enters approved data into SACWIS and posts to Publications website (http://jfs.ohio.gov/ocf/publications.stm).

8

There's an order of events for interim period cost reporting once the decision is made to pursue IV-E reimbursability for your program.

- 1. First...you must be licensed. Current rules state that can be through ODJFS or another state agency such as the former departments of Mental Health or Alcohol and Drug Addiction Services...now consolidated in the Department of Medicaid.
- 2. Although the child placement typically comes from a county or court, a private placement also fulfills the requirement. Without a census count, we cannot establish reimbursement ceilings. The minimum interim reporting period is 90 days. It commences the first day of the month of your agency's initial child placement and extends to the last day of the month that's 90 days from the placement date. For example, if the placement occurs on August 15<sup>th</sup>, then the interim reporting period would be August 1st (first day of the placement month) through November 30<sup>th</sup> (last day of month that's 90 days from date of placement). All costs/expenses and census data incurred during this period must be reported. Agencies are encouraged to contact me to discuss the proper interim reporting period for your program. This will ensure Title IV-E reimbursement ceilings cover the initial placement date.
- 3. Once the cost report is completed, it must be signed and dated and submitted to OFC along with proper backup documentation for the agency's reported costs/expenses and census as well as other required filing items.
- 4. OFC will review the submitted material, contact the agency if clarifications are needed, and calculate the final approved Title IV-E reimbursement ceilings.
- 5. OFC will email the approval letter and Title IV-E reimbursement ceilings calculation spreadsheet to the agency.
- OFC will then enter approved ceilings into SACWIS and post them on the Publications website noted on the screen.





### Filing Requirements for Interim Period Cost Reports

- Complete and submit a signed/dated hard copy and an electronic (Excel) file of the JFS 02911 Single Cost Report for the appropriate interim cost report period; contact OFC for proper interim reporting period.
- Submit a trial balance or income & expense statement reflecting the reported cost/expenses.
- Submit a census summary worksheet.
- Submit a completed Certification of Allowable Costs and a Related Party Disclosure Schedule. These can be obtained from OFC.
- All items can be emailed to Ryan.Meanor@jfs.ohio.gov.
- Note: A formal filing requirements document can be emailed to your agency upon request.

9

Filing Requirements for Interim Period Cost Reports.

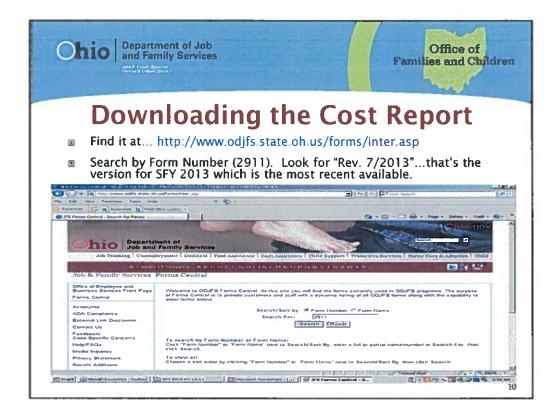
Agencies must complete a signed and dated hard copy of the JFS 02911 Single Cost Report for the appropriate interim cost report period. Agencies should contact OFC in order to determine the proper period that must be used. Typically, this is established during the initial conversation by OFC with the agency. Also, the electronic Excel file of the cost report must be submitted.

Agencies must provide proof of the costs reported on the cost report. Standard period cost reports are subjected to an agreed-upon procedures conducted by an independent CPA. This does not apply to interim period cost reports. In order to accomplish this financial tie-in with interim period cost reports, submission of a trial balance or interim period income and expense statement is required. It does not have to be reviewed or approved by a CPA. An example will follow shortly in the presentation.

Agencies must also submit proof of their reported census count. Detailed daily logs are not required. However, a summary worksheet indicating each child's admission date, discharge date (if applicable), and total days served during the interim cost report period must be submitted. And as with the trial balance, an example of the census summary will follow shortly in the presentation.

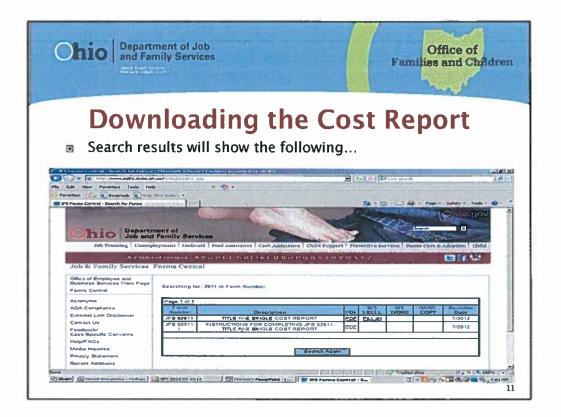
The Certification of Allowable Costs and the Related Party Disclosure Schedule must also be submitted. Each requires a signature and date. Examples are also forthcoming in the presentation.

All required items can be emailed to me at Ryan.Meanor@jfs.ohio.gov. Lastly, a formal filing requirements document can be emailed to your agency upon request.

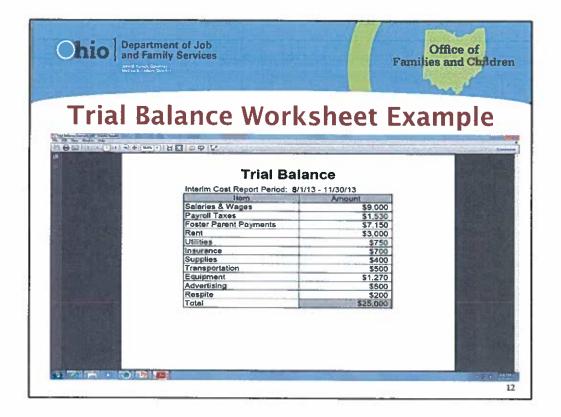


Here's the link to access the website in order to download the cost report form and instructions.

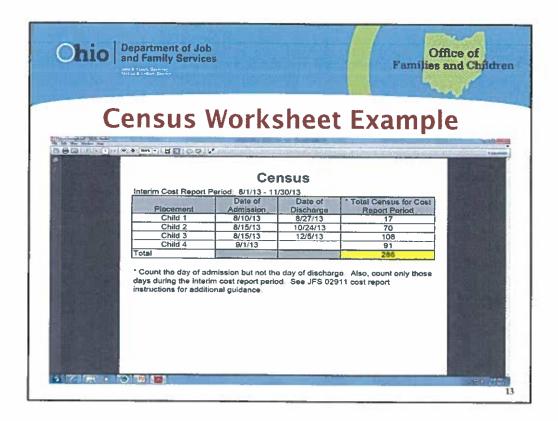
At the bottom is a snapshot of what the website looks like for the cost report download. It's called Forms Central. You can search by Form Number or Form Name...Form Number is the best option. Type in 2911 and you see search results showing a version for SFY 2013...it should say "Rev. 7/2013." That's the one you want!



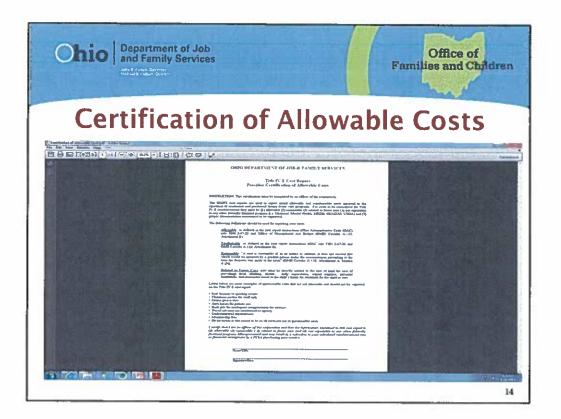
Search results will show this snapshot. Notice the Revision Date column on the right-hand side of the screen...it shows 7/2012...but as mentioned earlier the most recent is 7/2013. From here you can download the cost report form as an Excel file and you can download the instructions in a PDF file. But remember you must first lower the macro security by opening the Excel program on your computer and going to Tools, Options, Security. Change the security level from high to low. This will permit the macros to function properly.



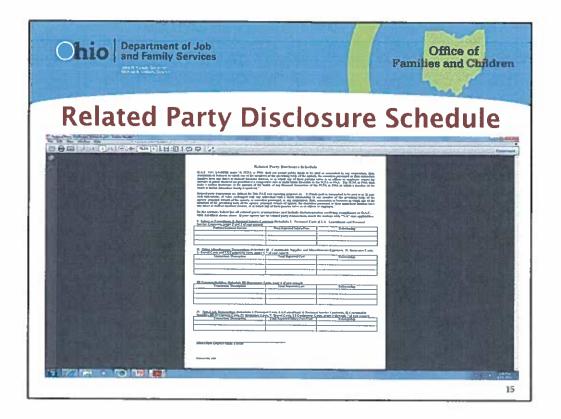
An example of a trial balance worksheet. 100% of an agency's cost must be reported. In this example, \$25,000 should be reflected on the interim period cost report. Bear in mind that although all costs must be reported, not all costs are Title IV-E reimbursable costs. Title IV-E reimbursable costs are those directly related to the cost of food, clothing, shelter, daily supervision, school supplies, a child's personal incidentals, liability insurance with respect to the child, and reasonable travel to the child's home for visitation as well the administrative costs associated with these items. Essentially, it's basic items that parents would provide for their child. Agencies should refer to the cost report instructions for more detail regarding Title IV-E reimbursable costs.



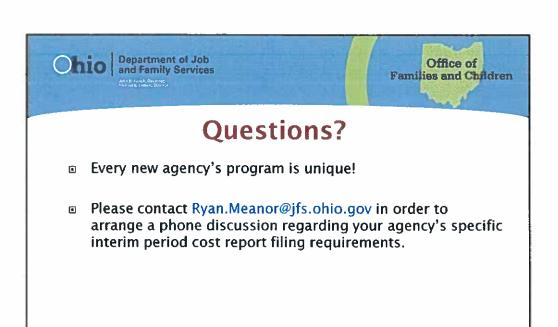
An example of a census summary worksheet. Child names are not necessary; identifying the placements as Child 1, Child 2, etc. is all that's needed. Please indicate the date of admission and the date of discharge (if applicable). In general, count the day of admission but not the day of discharge. Instructions regarding various types of absences can be found in the cost report instructions. Remember to count only those days in the interim cost report period.



Here's the Certification of Allowable Costs worksheet. As mentioned earlier, it can be emailed to you upon request.



And here's the Related Party Disclosure Schedule. It too can be emailed to you upon request.



16

Remember...every agency's program is unique. So, contact me at the email address listed here and we'll schedule a phone call to discuss your agency's specific interim period cost report filing requirements.