



Internal Monitoring Procedures Manual

Version 1.0 - Architecture Review Draft

A Companion to the Internal Monitoring & Program Integrity Policy

Purpose

This document is presented for architecture review. The Internal Monitoring & Program Integrity Policy is the governing document and remains separate from this procedures manual. This manual documents how CICL performs internal monitoring activities and self-assesses compliance using Ohio Administrative Code requirements, DODD compliance review expectations, Nineteen Services guidance, and CICL internal controls.



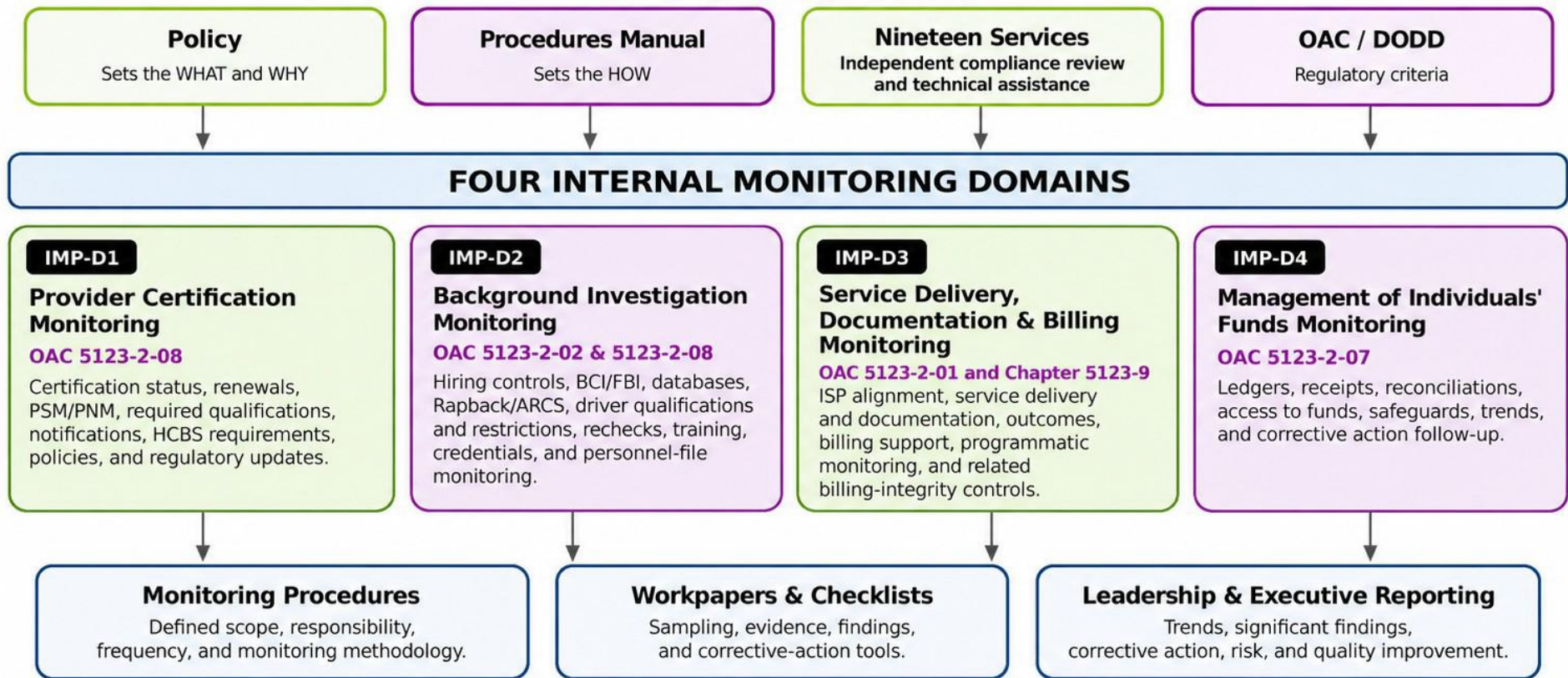
CHOICES IN COMMUNITY LIVING

INTERNAL MONITORING PROCEDURES MANUAL

A Companion to the Internal Monitoring & Program Integrity Policy

ARCHITECTURE

VERSION 1.0 - SEPTEMBER 2026



*Leadership approval establishes the four-domain Internal Monitoring Program architecture.
Individual monitoring procedures, checklists, workpapers, and reporting tools support implementation and may be updated as regulatory requirements and operational needs evolve.*

Relationship of Documents

- Internal Monitoring & Program Integrity Policy - Establishes governance, objectives, authority, and organizational expectations.
- Internal Monitoring Procedures Manual - Describes how CICL performs internal monitoring activities and self-assesses compliance.
- Nineteen Services - Provides independent compliance review, technical assistance, trend analysis, best-practice recommendations, and support for continuous quality improvement.
- Ohio Administrative Code - Establishes the regulatory requirements applicable to provider certification, background investigations, service delivery, documentation and billing, and management of individuals' funds.
- DODD Compliance Review Tool and Required Documents List - Identify the evidence and review criteria used during compliance reviews.

Proposed Manual Architecture

Section 1 - Administration

- Purpose
- Scope
- Authority
- Policy relationship
- Definitions
- Roles and responsibilities
- Conflicts of interest

Section 2 - Planning and Risk

- Annual monitoring plan
- Risk assessment
- Monitoring cycle
- Sampling methodology

Domains IMP-D1 through IMP-D4

- Domain overview
- Procedures numbered within each domain
- Required documentation
- Evidence expectations
- Workpapers and tools
- Reporting requirements
- Common findings and best practices

Section 7 - Reporting and Corrective Actions

- Findings and ratings
- Corrective action process
- Follow-up

- Executive reporting

Section 8 - Appendices

- Forms and workpapers
- Crosswalks and references
- Glossary

Internal Monitoring Domains

IMP-D1 - Provider Certification Monitoring

Primary regulatory reference: OAC 5123-2-08

To ensure CICL maintains compliance with all DODD certification requirements, applicable laws, regulations, and provider standards. Monitoring includes certification status and renewals, CEO/DOO qualifications, provider demographic information in PSM, HCBS settings compliance, policy and procedure review, regulatory and rule updates, and required notifications to DODD. Indicators include certification maintained without lapse, policies reflecting current requirements, and required updates submitted timely.

IMP-D2 - Background Investigation Monitoring

Primary regulatory reference: OAC 5123-2-02 and OAC 5123-2-08

To ensure all directors, supervisors, DSPs, DSP assistants, and volunteers meet background investigation requirements. Monitoring includes BCI/FBI requests and timelines, database reviews, Rapback/ARCS enrollment, Attestation & Agreements, disqualifying offense review, five-year rechecks when applicable, driver qualification reviews, and personnel file audits. Nineteen Services supports this domain through independent HR compliance review, technical assistance, monthly file review, training record review, and consultation regarding complex background investigation scenarios.

IMP-D3 - Service Delivery, Documentation & Billing Monitoring

Primary regulatory reference: OAC 5123-2-01 and applicable OAC Chapter 5123-9 service rules

To verify that services are delivered according to assessed needs, ISP requirements, applicable service-specific rules, and Medicaid billing requirements. Monitoring includes ISP implementation review, documentation review, outcome tracking, service observations, incident trend analysis, billing audits, payroll-to-billing reconciliation, EVV compliance review, documentation-to-billing validation, and external compliance review. Nineteen Services supports this domain through ISP/documentation crosswalk review, outcome note review, MAR and physician order review, documentation-to-billing review, and trend identification.

IMP-D4 - Management of Individuals' Funds Monitoring

Primary regulatory reference: OAC 5123-2-07

To ensure individuals' funds are managed in accordance with applicable regulations and agency policies. Monitoring includes ledger reviews, receipt reviews, monthly reconciliations, review of personal funds documentation, individual access to funds, trend analysis of findings, and corrective action follow-up. Indicators include accurate ledgers, timely reconciliations, required documentation present, and preservation of individuals' rights regarding personal funds.

Structure Within Each Domain

- Purpose
- Applicable Ohio Administrative Code
- DODD review focus
- Nineteen Services review focus
- CICL monitoring objectives
- Required documentation
- Detailed monitoring procedures
- Evidence reviewed
- Common findings
- Corrective actions
- Executive reporting
- Best practices and lessons learned

Implementation and Maintenance

Upon leadership approval of this architecture, each domain will be developed into detailed procedures, workpapers, checklists, reporting tools, and crosswalks. The approved Internal Monitoring & Program Integrity Policy will remain separate from this procedures manual.