

IMP-D4 – Management of Individuals' Funds Monitoring

Choices In Community Living (CICL)

Primary Regulatory Reference	OAC 5123-2-07 – Personal Funds of the Individual
Related DODD Review Criteria	Current DODD Agency Provider Compliance Review Tool - Personal Funds, including Questions 4.001-4.006 as applicable; OAC 5123-3-11 for licensed-facility room-and-board/personal-funds requirements; OAC 5123-17-02 as applicable to alleged misappropriation/exploitation and incident reporting
Related CICL Fiscal Policies	Policy 1 – Safe Keeping of Client Funds; Policy 2 – Client Bank Account; Policy 5 – Client Bank Account Reconciliation; Licensed Residential Facilities Purchasing Guidelines; Client Banking Responsibilities; Policy 15 – Use of Client Utilities for Agency Purposes; Policy 3 – Petty Cash; Policy 8 – Credit Card; and other applicable fiscal/personal-funds procedures
Primary Operational Oversight	Consumer Benefits Specialist, in coordination with Senior Program Managers
Monitoring Frequency	Monthly operational reconciliation oversight; quarterly internal monitoring sample and trend review; additional review when concerns, discrepancies, staff transitions, or incidents arise

Purpose

To ensure individuals' personal funds are retained, safeguarded, accurately accounted for, and made available in accordance with the individual's ISP, OAC 5123-2-07, applicable DODD review criteria, and CICL fiscal policies and procedures. Monitoring is intended to protect individuals' rights, identify errors or control weaknesses, verify timely corrective action, and identify trends requiring system-level improvement.

Relationship to CICL Fiscal Policies

IMP-D4 is a monitoring procedure and does not replace CICL's operational fiscal policies. The fiscal policies establish how client funds are handled; IMP-D4 establishes how CICL verifies that those requirements are being followed. Monitoring findings that identify a conflict, gap, or outdated requirement in a fiscal policy will be referred to the CFO and appropriate leadership for policy review and revision.

Roles and Responsibilities

Role	Responsibility
Consumer Benefits Specialist	Oversees the monthly bank reconciliation process with Senior Program Managers; verifies timely submission and required supporting documentation; reviews discrepancies, account balances, and follow-up; maintains or coordinates monitoring evidence.
Senior Program Managers	Coordinate completion and review of monthly reconciliations; work with Managers to obtain receipts, paystubs, ledgers/check registers and other documentation; address discrepancies and corrective actions.
Managers / Program Staff	Maintain required transaction documentation and personal-funds records in accordance with the ISP and CICL fiscal procedures; provide documentation needed for reconciliation and monitoring.
Fiscal Department / CFO	Provides fiscal oversight, reviews significant or recurring exceptions, supports corrective action, and evaluates fiscal policy changes when monitoring identifies a control or policy gap.
Internal Monitoring / Compliance	Performs or coordinates the quarterly IMP-D4 monitoring sample, trends findings, verifies corrective-action completion, and reports significant or recurring issues to leadership.

Monitoring Scope and Procedure

1. Individual Rights and ISP Parameters

Verify the ISP identifies CICL's role, the personal funds to which CICL has access, supports to be provided, applicable spending parameters, and individual access/control consistent with the person's abilities. Verify the individual is not required to use personal funds for items or services paid by Medicaid or another provider funding source.

2. Access to Funds and Deposits

Verify funds received by CICL are deposited within five calendar days and that funds managed by CICL are available to the individual upon request, but no later than three calendar days after the request. Review complaints or concerns regarding access to funds.

3. Ledger and Accounting Records

Review the applicable ledger, check register, or electronic accounting record for required elements, including the individual's name; source, amount and date of funds received; required deposit signatures; date, amount and recipient of withdrawals; required withdrawal signatures; and an accurate current balance.

4. Receipts and Supporting Documentation

Verify receipts are maintained when required by the individual's ISP/team. When required, receipts should identify the date, items purchased and amount. If a receipt is unavailable, verify other documentation or a written explanation is present.

5. Bank Account Reconciliation

Verify checking and savings accounts are reconciled to the most recent bank statement and the reconciliation is signed and dated. The Consumer Benefits Specialist oversees the reconciliation process with the Senior Program Manager and follows up on discrepancies, missing documentation, unusual activity, overdrafts, or late payments.

6. Independence / Segregation of Duties

Verify the person conducting the required reconciliation is not the person who provides direct assistance to the individual with managing personal funds and is not the person who maintains the accounting ledger/system. A second review may strengthen the control but does not replace the rule's independence requirement for the person conducting the reconciliation.

7. Cash, Gift Cards and Similar Accounts

Purchasing cash gift cards for individuals is not permitted. If an individual requires cash and assistance with obtaining or managing cash is outlined in the individual's ISP, staff may assist in accordance with the ISP and CICL procedures. When cash or other personal funds are received by CICL staff from a guardian, family member, or other source on behalf of an individual, the amount and source will be documented promptly in the individual's personal-funds accounting record and the funds safeguarded. Any portion not used immediately by the individual for personal spending in accordance with the ISP will be deposited into the individual's account within five calendar days of receipt. A cash account maintained by CICL is permitted only when specified in the individual's ISP. When such an account is maintained, the documented balance will be reconciled to the actual funds available at least every 30 calendar days, with the reconciliation signed and dated by an appropriately independent person.

8. Safeguarding and Prohibited Uses

Verify personal funds are safeguarded, not commingled with CICL funds, and not used to supplement or replace CICL's funds or another individual's funds except where a practical arrangement is agreed upon and documented in writing. Review for conflicts of interest or questionable purchases.

9. Benefits and Resource Limits

Review whether staff identify accounts approaching applicable benefit/resource limits and whether the team is notified when funds exceed or are projected to exceed applicable eligibility limits or when an individual receives a lump-sum payment or inheritance.

10. Training

Verify personnel who directly assist with funds, maintain accounting records, or conduct reconciliations have received required training on OAC 5123-2-07 and CICL's written personal-funds policies and procedures.

11. Losses, Misappropriation and Restoration

Review identified losses, alleged misappropriation/exploitation, overdrafts, missing documentation, or other material discrepancies to verify required incident reporting, investigation, reimbursement/restoration, and corrective action were completed as applicable.

12. Termination / Transfer of Services

When applicable, verify cash balances and final itemized statements/funds are released within regulatory timeframes when CICL's responsibility for managing funds ends. Review transfers of account responsibility for appropriate reconciliation and documentation.

13. Licensed Residential Purchasing and Agency Use of Client Resources

When applicable, verify individual funds are not charged for costs that are CICL's or the licensed home's responsibility. Review purchases and client-resource use against the Licensed Residential Facilities Purchasing Guidelines and Fiscal Policy 15. For individuals residing in licensed facilities, verify the individual retains the personal-funds amounts required by OAC 5123-3-11, including at least \$100 per month from unearned income and, when applicable, the first \$100 per month of earned income plus one-half of earned income in excess of \$100. The timing and method by which spending funds are made available will follow the individual's ISP, applicable room-and-board arrangements, and CICL procedures while preserving required access to personal funds.

14. Trend Analysis and Corrective Action

Trend exceptions by type, location, responsible area, and repeat occurrence. Assign corrective action, responsible person, and due date. Verify completion and determine whether recurring findings require training, policy revision, increased monitoring, or leadership intervention.

Sampling and Frequency

Monthly reconciliations remain an operational requirement and are overseen through the Consumer Benefits Specialist/Senior Program Manager process. For IMP-D4 internal monitoring, CICL will review a quarterly sample designed to cover approximately 25% of applicable individuals/accounts over the monitoring cycle, with additional targeted reviews for prior findings, higher-risk accounts, staff transitions, unusual transactions, complaints, overdrafts, missing documentation, or suspected misuse. Significant concerns may result in expansion to a 100% review of the affected location, process, or time period.

Evidence Reviewed

Evidence may include the ISP and personal-funds parameters; bank statements; ledgers/check registers; reconciliation forms; receipts and written explanations; deposit documentation; cash and gift-card records; invoices and paystubs; account-balance reports; benefit/resource-limit follow-up; staff training records; incident/MUI documentation; reimbursement or restoration records; Fiscal review notes; and corrective-action documentation.

Indicators of Compliance

Indicators include accurate and complete ledgers; deposits and access to funds within required timeframes; reconciliations completed timely by an independent person and signed/dated; required receipts and documentation present; personal funds safeguarded and not commingled or improperly used; individual rights and ISP parameters followed; required team notifications made; staff appropriately trained; and identified exceptions corrected and not repeatedly recurring.

Corrective Action and Reporting

Exceptions will be documented on the IMP-D4 monitoring checklist or related workpaper and assigned to the responsible manager or department with a due date. Material, repeated, or rights-related findings will be escalated to the CFO and appropriate leadership. Corrective action may include record correction, reimbursement/restoration, retraining, increased monitoring, policy revision, disciplinary action when appropriate, or referral through the incident/MUI process. Completion will be verified and documented.

Appendix A – IMP-D4 Management of Individuals' Funds Monitoring Checklist

Quarterly Internal Monitoring Review

Review Period:		Reviewer:	
Individual / Account:		Program / Location:	
Senior Program Manager:		Consumer Benefits Specialist:	
Prior Finding / High Risk?	☐ No ☐ Yes	Expanded Review Required?	☐ No ☐ Yes

#	Monitoring Test	Evidence / Notes	Y / N / N/A	Finding / Corrective Action
1	ISP identifies CICL's role, supports, access, and spending parameters; individual rights/control preserved.		☐ Y ☐ N ☐ N/A	
2	Funds received are deposited within 5 calendar days.		☐ Y ☐ N ☐ N/A	
3	Ledger/accounting record contains required receipt/deposit/withdrawal information and current balance.		☐ Y ☐ N ☐ N/A	
4	Receipts are present when required by the ISP/team; missing receipts have acceptable alternative documentation/explanation.		☐ Y ☐ N ☐ N/A	
5	Bank account is reconciled to the most recent statement; reconciliation is signed and dated.		☐ Y ☐ N ☐ N/A	
6	Person conducting reconciliation is independent of direct fund assistance and ledger/accounting maintenance.		☐ Y ☐ N ☐ N/A	
7	Cash handling: purchasing cash gift cards for individuals is prohibited. If cash assistance is authorized by the ISP, verify cash received from a guardian/family/other source is promptly documented with amount and source; any amount immediately provided to the individual is documented; and any remaining amount is safeguarded and deposited into the individual's account within 5 calendar days. If CICL maintains a cash account, verify it is specified in the ISP and reconciled to actual funds at least every 30 calendar days; reconciliation is signed and dated.		☐ Y ☐ N ☐ N/A	
8	Personal funds are safeguarded and not commingled with CICL funds.		☐ Y ☐ N ☐ N/A	
9	No improper use of one individual's funds for CICL or another individual; any practical shared arrangement is documented in writing.		☐ Y ☐ N ☐ N/A	
10	Account/resource-limit concerns, lump sums, or inheritances are identified and team notification is documented when applicable.		☐ Y ☐ N ☐ N/A	
11	Applicable staff training on OAC 5123-2-07 and CICL personal-funds policies is current.		☐ Y ☐ N ☐ N/A	
12	No unexplained losses, overdrafts, questionable transactions, or indicators of misappropriation/exploitation; required follow-up completed when applicable. When a finding meets UI/MUI or other incident-reporting criteria, verify the required incident report was completed, submitted, and followed through in accordance with OAC 5123-17-02 and CICL incident-reporting procedures.		☐ Y ☐ N ☐ N/A	
13	Licensed-home purchases and agency use of client resources are consistent with applicable CICL fiscal policies and do not improperly shift agency costs to individuals. For licensed-facility residents, required monthly personal-funds amounts under OAC 5123-3-11 are retained and available consistent with the ISP, room-and-board arrangements, and CICL procedures.		☐ Y ☐ N ☐ N/A	
14	Prior findings/corrective actions were completed and repeat findings were addressed.		☐ Y ☐ N ☐ N/A	
15	If services/account responsibility ended or transferred, required final reconciliation, release of funds, and documentation were completed timely.		☐ Y ☐ N ☐ N/A	

Overall Review Conclusion

Overall Status	☐ Compliant ☐ Corrective Action Required ☐ Expanded Review Required
Findings / Trends Identified	
Corrective Action / Responsible Person / Due Date	
Follow-Up Verification	
Escalation to CFO / Leadership	☐ No ☐ Yes Date: _____
Review Closed	Date: _____ Reviewer Initials: _____