

## Exhibit A – IMP-D3 Programmatic Focus Spot Check Sheet

**Policy Framework Reference:** Apply the Golden Thread framework established in CICL's Internal Monitoring & Program Integrity Policy when evaluating the alignment of service delivery, documentation, outcomes, and billing.

|                     |  |                          |  |
|---------------------|--|--------------------------|--|
| <b>Client Name:</b> |  | <b>Staff Member:</b>     |  |
| <b>Reviewer:</b>    |  | <b>Review Date/Span:</b> |  |

**INSTRUCTIONS:** Determine whether the service provided, documentation completed, and billing submitted are consistent and support the outcomes for the client. Document findings and identify corrective actions when needed. Mark each item C – Compliant, PC – Partially Compliant, or NC – Non-Compliant.

| Programmatic Spot-Check Test                                                                                                                                                                                   | Rating<br>C / PC / NC                                                              | Evidence / Findings | Corrective Action / Follow-Up |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|---------------------|-------------------------------|
| 1. Was the documentation consistent with the client's identified task elements, needs, and outcomes?                                                                                                           | <input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC | <br><br>            | <br><br>                      |
| 2. Is there a clear connection between the client's needs and the service being provided?                                                                                                                      | <input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC | <br><br>            | <br><br>                      |
| 3. Was the appropriate service code / billing code used and supported by the documentation?                                                                                                                    | <input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC | <br><br>            | <br><br>                      |
| 4. Is the documentation thorough and does it demonstrate alignment among the ISP, service provided, and the client's identified outcome(s), consistent with the Golden Thread framework established in policy? | <input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC | <br><br>            | <br><br>                      |
| 5. Is there evidence that the staff meaningfully completed the work/documentation?                                                                                                                             | <input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC | <br><br>            | <br><br>                      |
| 6. If a prior concern was identified for this staff member, client, or program, was follow-up completed and improvement demonstrated?                                                                          | <input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC | <br><br>            | <br><br>                      |

**Comments / Trends:**

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| <b>Overall Review</b>                            | <input type="checkbox"/> Compliant <input type="checkbox"/> Partially Compliant <input type="checkbox"/> Non-Compliant |
| <b>Follow-Up or Continued Monitoring Needed?</b> | <input type="checkbox"/> No <input type="checkbox"/> Yes                                                               |
| <b>Responsible Position / Due Date</b>           |                                                                                                                        |
| <b>Escalation Needed?</b>                        | <input type="checkbox"/> No <input type="checkbox"/> Yes If yes, to: _____                                             |
| <b>Follow-Up Completed / Review Closed</b>       | Date: _____ Reviewer Initials: _____                                                                                   |

**Additional Follow-Up Documentation:**

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## **Exhibit B – Supporting Fiscal Control Reference**

### **Payroll-to-Billing Reconciliation**

The Payroll-to-Billing Reconciliation is maintained as a separate supporting Fiscal procedure under IMP-D3. It provides a 100% payroll-period detective control comparing payroll-paid hours to billed and unpaid service hours. The supporting procedure includes its own Periodic Oversight Review Checklist and should be read together with this IMP-D3 programmatic monitoring procedure when evaluating the full Service Delivery, Documentation & Billing domain.

### **Why It Is Maintained Separately**

The programmatic spot check applies the Golden Thread framework established in CICL's Internal Monitoring & Program Integrity Policy at the individual/service-documentation level. The payroll-to-billing reconciliation evaluates the population of payroll-period hours as a Fiscal control. Maintaining the procedures separately avoids duplicate workpapers while preserving clear accountability and evidence for each control.