

IMP-D3 – Service Delivery, Documentation & Billing Monitoring

Choices In Community Living (CICL)

Primary Regulatory Reference	OAC 5123-2-08 – Provider Certification – Agency Providers; applicable OAC Chapter 5123-9 service-specific documentation and billing requirements
Related Review Framework	DODD Compliance Review Tool; CICL Internal Monitoring & Program Integrity Policy and Procedures Manual; Nineteen Services guidance and review support
Programmatic Focus	Policy Framework Application: Assessed Needs → ISP → Authorized Service → Service Delivery → Service Documentation → Outcome Documentation → Medicaid Billing
Primary Program Roles	Senior Program Directors (SPDs), Program Directors (PDs), Senior Program Managers (SPMs), Program Managers, and Direct Support Professionals (DSPs)
Monitoring Frequency	Weekly PD spot checks; ongoing/daily manager documentation review and approval; mid-month and monthly outcome/audit-report review; periodic IMP-D3 oversight and trend review
Supporting Fiscal Control	Payroll-to-Billing Reconciliation – 100% of each payroll period, with periodic oversight review

Purpose

To verify that services are delivered according to assessed needs, the Individual Service Plan (ISP), authorized services, applicable service-specific requirements, and Medicaid billing expectations. IMP-D3 operationalizes the Golden Thread framework established in CICL's Internal Monitoring & Program Integrity Policy by monitoring whether assessed needs, authorized supports, actual service delivery, documentation, outcomes, and billing are aligned and supported by sufficient evidence.

Application of the Golden Thread Framework

The Golden Thread framework is established in CICL's Internal Monitoring & Program Integrity Policy. IMP-D3 does not redefine that framework; it applies the policy by reviewing the operational alignment of Assessed Needs → ISP → Authorized Service → Service Delivery → Service Documentation → Outcome Documentation → Medicaid Billing. Review evidence should allow the monitoring team to follow that alignment from the individual's assessed need through the claim submitted for reimbursement.

1 Assessed Needs	2 ISP	3 Authorized Service	4 Service Delivery	5 Service Documentation	6 Outcome Documentation	7 Medicaid Billing
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Relationship to Supporting Controls

IMP-D3 is the umbrella monitoring domain for programmatic service delivery, documentation, outcomes, and billing support. The Programmatic Spot Check in Exhibit A is the primary program review tool. The separate Payroll-to-Billing Reconciliation is a supporting Fiscal program-integrity control within IMP-D3 and is not duplicated in the programmatic spot check. Its periodic oversight checklist remains with that supporting procedure.

Roles and Responsibilities

Role	Responsibility
Senior Program Directors (SPDs)	Establish program expectations, support consistent implementation, review recurring or material concerns, and ensure appropriate escalation and corrective action.
Program Directors (PDs)	Conduct weekly spot checks of staff documentation and manager approvals; provide feedback and training; monitor follow-up; escalate unresolved concerns to the SPD and HR when appropriate.
Senior Program Managers (SPMs)	Support ISP/task-element alignment, review audit reports and outstanding outcomes, assist with follow-up, and work with PDs and Program Managers to address documentation concerns.
Program Managers	Review and approve staff time/documentation on an ongoing basis, preferably daily; maintain program binders and duty/task lists; coach

	staff; document and monitor improvement when expectations are not met.
Direct Support Professionals (DSPs)	Provide services consistent with the ISP and complete accurate, thorough, timely documentation that reflects services provided and progress toward outcomes.
Billing / Fiscal	Support review of service/billing alignment and operate the separate payroll-to-billing reconciliation control. Fiscal personnel investigate or support resolution of billing exceptions as applicable.
HR / Training Support	Support documentation and compliance training, orientation, training resources, and personnel follow-up when concerns require HR involvement.
Nineteen Services	Provides independent compliance review, technical assistance, documentation-to-billing review, trend identification, and best-practice recommendations as incorporated into CICL monitoring.

Monitoring Scope and Procedure

1. ISP, Assessed Needs and Task-Element Alignment

Review the applicable ISP and service/support information to determine whether identified needs, task elements, services, supports, and outcomes are aligned. Program leadership should evaluate whether task elements remain appropriate, are manageable, and directly relate to identified needs and outcomes. When staffing patterns and schedules are reviewed, the Services and Supports section of the ISP should also be considered.

2. Service Delivery and Documentation

Determine whether documentation reflects the service actually provided and is consistent with the ISP, task elements, needs, and outcomes. Documentation should be sufficiently thorough to demonstrate what occurred, the support provided, and the connection to the individual's needs and outcomes.

3. Outcome Documentation

Determine whether progress toward identified outcomes is documented and whether outstanding or missed outcomes are identified for follow-up. Program leadership should use available audit and reporting tools to identify outcomes that require attention.

4. Service Code / Billing Support

Determine whether the service code or billing code used is appropriate for the documented service and whether documentation supports the service submitted for reimbursement. Potential inconsistencies will be referred for billing/program review and correction as appropriate.

5. Weekly PD Spot Checks

PDs will conduct weekly spot checks of staff documentation within their programs, including review of work approved by managers. Exhibit A provides the standardized Programmatic Focus Spot Check Sheet. Findings should be documented and used to establish consistent expectations across programs.

6. Manager Review and Approval

Program Managers are expected to review staff time and documentation on an ongoing basis, with daily review encouraged so documentation can be considered within the applicable service segment rather than deferred until the end of an approval period. Approval practices should require meaningful review of the underlying documentation.

7. Staff and Manager Training

DSP training should explain both what documentation is required and why it is important to service delivery, outcomes, and billing. Training may include note-review exercises, scenario-based note development, and practical documentation exercises. Managers should receive additional training on reviewing staff work, sufficient documentation, ISP task elements, and service/outcome alignment.

8. Follow-Up for Documentation Concerns

When documentation does not meet expectations, the Program Manager should discuss the concern with the staff member, consult with the PD regarding additional support or training, and monitor subsequent documentation for improvement. The PD and manager should continue monitoring until expectations are met. Persistent concerns may be escalated to the SPD and HR.

9. Program Binder and Daily Duty Task Lists

Program Managers should maintain required program binders and keep them current. Identified outcomes may be incorporated into daily duty/task lists to clarify staff responsibility and reduce the risk that an outcome or task is assumed to be another staff member's responsibility. Binder status should be reviewed during PD check-ins and home reviews.

10. Audit Report and Outcome Review

SPMs should review available audit reports approximately halfway through each month to identify whether outcomes are being addressed. PDs and SPMs should also review the prior month's audit reports when submitted, using the review to identify outstanding outcomes, documentation concerns, and needed follow-up.

11. Trend Analysis and System Improvement

Recurring findings from spot checks, audit reports, documentation reviews, billing concerns, training issues, and supporting Fiscal controls should be trended. Leadership should determine whether trends require additional training, clarification of expectations, process changes, expanded review, or other corrective action.

Sampling and Frequency

PD programmatic spot checks are performed weekly. The spot-check sample should be sufficient to assess manager approvals and DSP documentation across the PD's programs and should rotate across individuals, staff, service dates, and locations over time. Additional targeted reviews should be performed for prior findings, recurring documentation concerns, billing exceptions, complaints, identified outcome gaps, or other elevated-risk conditions. Manager documentation review is an operational activity performed on an ongoing basis and is separate from the PD spot check.

Evidence Reviewed

- Current ISP and applicable Services and Supports / task elements
- Service documentation and staff notes
- Manager-approved time/work records
- Outcome documentation and applicable audit reports
- Service/billing code information and related billing support
- Program binder and daily duty/task lists, when relevant
- Training records or coaching documentation, when relevant
- Spot-check forms and corrective-action/follow-up documentation
- Supporting payroll-to-billing reconciliation evidence when a billing concern requires cross-reference

Indicators of Compliance

Indicators include evidence that the Golden Thread framework established in the Internal Monitoring & Program Integrity Policy is operating as intended from assessed need through billing; documentation consistent with the ISP and services provided; meaningful outcome documentation; appropriate service/billing codes; evidence of manager review; weekly PD spot checks; identified concerns followed through to correction; and recurring issues trended and addressed.

Corrective Action and Reporting

Findings identified through IMP-D3 monitoring will be documented and assigned to the appropriate responsible position for follow-up. Corrective action may include staff coaching, retraining, documentation correction when permitted, billing correction, ISP/team follow-up, process clarification, expanded monitoring, or escalation to the SPD, HR, Fiscal, or other leadership as appropriate. Material or recurring concerns will be evaluated for program-integrity impact and tracked through resolution.

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.

Client Name:		Staff Member:	
Reviewer:		Review Date/Span:	

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 C / PC / NC	Evidence / Findings	Corrective Action / Follow-Up
1. Was the documentation consistent with the client's identified task elements, needs, and outcomes?	☐ C ☐ PC ☐ NC	 	
2. Is there a clear connection between the client's needs and the service being provided?	☐ C ☐ PC ☐ NC	 	
3. Was the appropriate service code / billing code used and supported by the documentation?	☐ C ☐ PC ☐ NC	 	
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?	☐ C ☐ PC ☐ NC	 	
5. Is there evidence that the manager meaningfully reviewed and approved the staff work/documentation?	☐ C ☐ PC ☐ NC	 	
6. If a prior concern was identified for this staff member, client, or program, was follow-up completed and improvement demonstrated?	☐ C ☐ PC ☐ NC	 	

Comments / Trends:

Overall Review	☐ Compliant ☐ Partially Compliant ☐ Non-Compliant
Follow-Up or Continued Monitoring Needed?	☐ No ☐ Yes
Responsible Position / Due Date	
Escalation Needed?	☐ No ☐ Yes If yes, to: _____
Follow-Up Completed / Review Closed	Date: _____ Reviewer Initials: _____

Additional Follow-Up Documentation:

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.