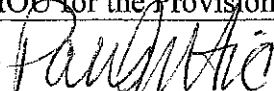


Catholic Charities Disabilities Services
Agency Procedure

Standard Category	Individualized Community Services
Standard Title	Self-Directed Services- Fiscal Intermediary
Regulations	Administrative ADM 2019-07
Original Issue Date	November 16, 2022
Latest Revision Date	April 24, 2023
Number of Pages	3
Attachments	MOU for the Provision of Fiscal Intermediary Services
Approved by: Paula Jubic, Executive Director	

Introduction: The agency provides Fiscal Intermediary services for OPWDD approved participants of Self Directed Supports and Services.

Fiscal intermediary (FI) Role: The Fiscal Intermediary (FI) is the co-employer and employer of record. The FI provides supports to individuals who choose to self-direct their services. The FI responsibilities include implementing Human Resource activities to complete billing and payment of services. They train the self-hired staff, review daily documentation, and monthly summaries to ensure compliance with ADMs and self-direction program guidance. FIs review and process invoices for reimbursement to individuals/families. The FI will track and ensure they have the current documentation including: the individual’s Life Plan (LP), most current budget, Staff Action Plan (SAP), Level of Care Determinations (LCED). They attend participant’s LP meeting and the semiannual meeting (if requested). The FI will review the LP document to ensure accuracy and have a copy of the active plan. They ensure expenditure reports that are generated in eVero are approved and distributed by the end of the following month. The FI prepares reports for finance to bill Medicaid for services provided. They process payroll for any self-hired staffing. Attendance by FI or designee in the quarterly FI meeting hosted by OPWDD is required.

Review of daily documentation:

FI duties include oversight of daily documentation notes completed by Self Directed Support Professionals (SDSP).

Oversight of this documentation include ensuring notes contain the following elements: the note addresses Staff encouraging goals and mentions the individual’s response to the goal.

The FI will check to see if participant signed off on the note, check the time stamp of the note, electronic verification visit (EVV) versus manual visit verification status (MVV), and review the

mileage submitted by the staff to validate activities mentioned in the note. If the individual is unable to review the note, the FI will work with the broker to assist the individual and/or family.

FI will address discrepancies and once the above are met, will approve the notes in order to process payroll which occurs every other Monday, or as scheduled.

Once all notes are approved from the FI's caseload, the FI will approve each SDSP time card in eVero, and compare to Kronos (once the eVero file has been uploaded by HR). The FI will then sign off on the employee time card in Kronos.

Program Audit / Billing Validation:

FI Team will maintain a process for scheduled sample auditing of one individual from CCDS FI services monthly, with shared results in a spreadsheet in Teams or other designated share file location. The process will review all individuals who have had active staff that year and will cover all individuals at least one time within one audit year. The audit will include all staff for the individual, will verify service start and end locations, and will compare services times with the time entry for the service documentation. The FI will follow up with family and/or CCDS QA when applicable for certain findings.

As part of the verification process, FIs will periodically remind individuals receiving services and/or their family or guardian, that as co-employers, they should be reviewing the documentation. The reminder will include how to access the documentation in the electronic system and a reminder to utilize their Broker if they have any issues. The individual, family or guardian should reach out to the FI with any areas of concern or discrepancy.

Invoices/reimbursements:

FI's are responsible for reviewing the various reimbursements individual's and their families may submit and ensure they meet criteria listed in ADMs and the self-direction provider guidance. These reviews will take place on an ongoing basis and completed each week by the end of business day Wednesday for distribution the following Friday unless otherwise specified.

The FI reviews and verifies the FI billing level to ensure it meets all billing requirements. The senior FI or designee then pushes this billing through to finance.

The FI is also responsible for reviewing and processing all SDSP mileage and staff activity fees to ensure appropriate expenses based on the criteria in the ADM and Self-Direction Guidance. When reviewing mileage it is important to evaluate the trip start/ end time in addition to the start/ end address and compare with the service note for the day to ensure consistency. Once verified by the FI, the Director or designee will generate the mileage report to provide to HR. The director or designee will generate the invoices so the staff mileage is deducted from the individuals budget using the payroll Monday date.

Training:

FI's train all SDSPs on the electronic platform eVero/ Electronic Visit Verification (EVV) during orientation and as needed. If a FI determines a SDSP needs addition training to ensure they are meeting all program requirements they will provide additional training.

Billing:

The senior FI will ensure reports are ready for finance to bill for services. They will troubleshoot with the director and ensure billing is ready by the end of the following month.

Other FI Responsibilities:

Oversight or monitoring of the following items to ensure timeliness and compliance with ADM and Self-Direction Manual:

Staff Action plans:

The broker submits SAPs through eVero. The FI will review them and compares them to the LP.

Life Plan meeting:

The FI attends the annual LP Meeting and any addition meetings, as needed or requested.

Broker Billing:

The FI approves broker billing on a monthly basis.

The FI ensures compliance with circle of support meetings.

LCED:

All eligibility forms are uploaded by the FI or care manager via eVero. This is verified annually.

Monthly Summaries:

Monthly Summaries are to be completed by the SDSP no later than the last day of the following month. These summaries are reviewed by the FI and must provide an overview of the previous month activities.

Expenditure reports:

Ensure billing for the previous month is complete by the end of the following month. Once billing is concluded expenditure reports will be approved by the FI on or before the last day of the following month.