

## Provider Compliance Review Suggested On-Site Sampling Protocol – 2007

1. Before making a first contact with the provider, check the County Provider Sample Excel spreadsheet that lists provider names and the individuals for whom they have billed in the past 12 months. Refer to this list when discussing sample names with the provider.
2. Send the initial notification letter, and call the provider a few days later to explain the PC review process. Using the following scale, tell them how many **Individual's Records** will be reviewed:

Number of Individuals on IO and Level 1 served in that county	Number of Individual Records	Number of Individuals on IO and Level 1 served in that county	Number of Individual Records
1 - 2	1	16 – 32	4
3 - 8	2	33 – 75	5
9 - 15	3	Over 75	8%

3. Recommended documents that should be reviewed during the Provider Compliance Review process include any or all of the following that may pertain to the individual's chosen in the recipient sample:
  - Current ISP – what services are to be delivered, what training is needed for this individual's specific service needs
  - BSP- what documentation is provided and what training is needed for this individual's BSP
  - Medication Administration Records-documentation, training needs
  - Waiver documentation (ODMRDD uses 2-3 months)-documentation of services delivered, who delivered the services
  - Incident records- following rule
  - Anything else that allows the reviewer to determine if “services have been provided according to the ISP”.
4. Select specific names and ask the provider to send, or have on-site during the Provider Compliance Review, the pre-survey information on those individuals. If submitted prior to the onsite review, the deadline for receipt of the documents should be a few days in advance of the on-site review. If possible, include individuals who:
  - Are still served by the provider
  - Have relatively high billing figures
  - Receive transportation services (if transportation is one of the billed services)
  - Have a behavior support plan
  - Receive medication administration services
  - Receive medications and/or feedings via G-tube or J-tube
  - Receive subcutaneous insulin injections

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5. Explain that **Personnel Files** will be pulled for employees who work with the individuals in the sample above. Using the following scale, tell the provider how many personnel files will be reviewed:

Number of Individuals on IO and Level 1 served in that county	Number of Personnel Files	Number of Individuals on IO and Level 1 served in that county	Number of Personnel Files
1 – 2	1	16 – 32	6
3 – 5	2	33 – 75	8
6 – 10	4	Over 75	10
11 –15	5		

5. Tell the provider that specific employee names will be selected on site for personnel file reviews. Ask the provider to prepare a list of all employees who work with the sample individuals, noting hire dates and which of these staff:
- Provide transportation services (if transportation is one of the billed services)
  - Provide behavior support services
  - Administer medications
  - Administer medications and/or feedings via G-tube or J-tube
  - Administer subcutaneous insulin injections
6. On site, use the list of employees who work with individuals in the sample and select specific names for personnel file reviews. This matching process is important to link (1) the staff, (2) the individual, (3) the services outlined on the ISP and (4) the training that the staff have received in order to efficiently and safely provide the day to day services.