The purpose of this handbook is to inform network providers on what to expect before, during, and after an on-site monitoring visit by Central Florida Cares Health System, Inc.

Network Monitoring Handbook

A Guide for On-Site Monitoring Visits

Central Florida Cares
Health System

November 2013 Edition

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INTRODUCTION

It is the policy[1] of Central Florida Cares Health System, Inc. (CFCHS) that it will monitor its provider network to ensure compliance with laws and regulations, negotiated program descriptions, clinical quality, and contract requirements. Frequency of monitoring is determined by the annual risk assessment performed in July of each fiscal year. Monitoring tools and the Network Monitoring Handbook will be available on the CFCHS website to assist network providers in understanding the monitoring process and planning operations to be successful in complying with requirements.
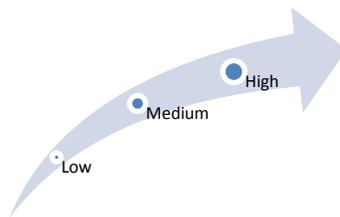
RISK ASSESSMENT

It is the policy[2] of Central Florida Cares Health System (CFCHS), Inc. to assess each subcontractor/provider annually to determine the level of risk. The level of risk assessed will be utilized in the development of the subcontracted provider monitoring schedule. This risk determination will be made utilizing a risk assessment tool developed by the CFCHS staff and approved by the Quality Oversight Committee.

Risk factors include:

- Contract Amount
- Financial Ratios
- Type of Funding and Services
- Key Organizational Change
- Date of Last Contract Monitoring Visit
- Historical Corrective Action Plans
- Historical Surplus and Deficit Spending
- Data Submission
- Critical Incident Reports

ON-SITE MONITORING SCHEDULE

Providers will be assigned a risk level of low, medium, or high calculated by the Risk Assessment Tool. Providers deemed high risk will be monitored at minimum annually and will usually fall at the beginning of the monitoring schedule. Providers deemed medium risk will be monitored at minimum every two years. Providers deemed low risk will be monitored at minimum every three years.

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[1] See Appendix A
[2] See Appendix A

PRE-SITE VISIT ACTIVITIES

CENTRAL FLORIDA CARES HEALTH SYSTEM

The CFCHS Contract Manager assigned to the provider being monitored takes the lead and assembles a monitoring team based on the scope of the monitoring and the sample size of records to be reviewed. Other activities include:

- Developing an agenda
- Notifying the provider of dates, times, and agenda for the on-site visit.
- Obtaining and reviewing any external monitoring, licensure, and/or accreditation reports from reviews conducted within the past 12-24 months.
- Meeting with the monitoring team to ensure that all members understand their role in the monitoring process to ensure a smooth and efficient on-site visit.

NETWORK PROVIDER

It is highly recommended that the provider assign a single point of contact for the duration of the monitoring process, from preliminary activities through closure of a corrective action plan, if necessary. This person should be available by phone or email and should be present in person during the on-site visit.

Activities expected of the single point of contact at this stage include:

- Coordinate with the CFCHS Contract Manager in terms of dates, times, and locations of the site visit.
- Provide upon request any external monitoring, licensure, and/or accreditation reports from reviews conducted within the past 12-24 months.
- Provide any other lists, materials, or documents upon request by the CFCHS Contract Manager.

ON-SITE MONITORING ACTIVITIES

ENTRANCE CONFERENCE

Introductions

Agenda

Q & A
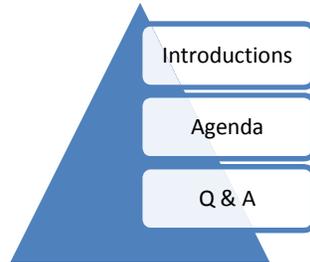
An entrance conference lasting approximately 30 minutes will occur before the site visit begins. The meeting will be facilitated by the Monitoring Team Lead which is the CFCHS Contract Manager. The entire CFCHS Monitoring Team will be present for the entrance conference. The main purpose of the meeting will be to introduce the team, present the site visit agenda, and discuss any questions the network provider may have about the visit.

Though greatly appreciated, please refrain from supplying free refreshments or gifts during the site visit. Gratuitous items may create the appearance of impropriety, which is against CFCHS ethical standards. CFCHS staff may purchase refreshments from the provider at fair market value if necessary, or may bring their own refreshments or make other arrangements.

SITE VISIT

Team: Generally, the CFCHS Monitoring Team will consist of a Lead Monitor (Contract Manager) and subject matter experts from the following CFCHS Departments:

- Quality
- Finance
- Data
- System of Care

Length of Visit: The site visit could last anywhere from one day to one week or more depending on the scope and volume of records to be reviewed. The specific length of time for each individual site visit will be coordinated between the CFCHS Lead Monitor and the Provider's Single Point of Contact during the pre-site visit activities.

Environment: A private conference room or vacant office is necessary for the Monitoring Team to be able to work without disrupting provider operations. Additionally, an environment absent of distractions will allow the team to complete the site visit timely and accurately. Access to wireless internet is preferred, but not mandatory.

Method: The specific agenda for the site visit will be presented during the Entrance Conference. However, it can usually be expected that the following will occur during each site visit:

- Entrance Conference
- Review of Policies and Procedures

- Review of Personnel Records
- Review of Client Charts and Service Activity Logs
- Review of Incident Reports
- Interviews with Clients and Staff
- Tour of Facility
- Observation of data, financial, and billing processes
- Exit Conference

The CFCHS Monitoring Team will make every effort to:

- Create as little disruption to the provider's operations as possible while on site.
- Communicate frequently with provider staff during the monitoring visit to ensure there are no surprises during the Exit Conference.

Activities expected of the single point of contact at this stage include:

- Coordinate with the CFCHS Contract Manager in terms of all on site activities.
- Act as the main liaison between the CFCHS Monitoring Team and the provider's staff during the site visit.

CFCHS may adjust the scope if unexpected issues arise during monitoring.

EXIT CONFERENCE

Strengths & Weaknesses → Q & A → Next Steps
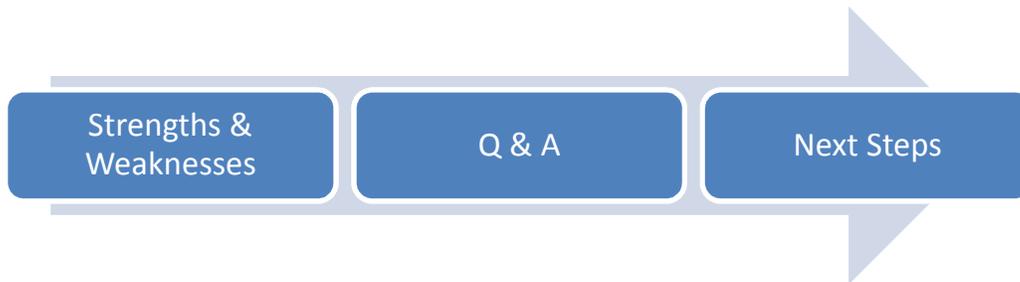
An exit conference will occur at the conclusion of the site visit. Generally, and exit conference should last no longer than 60 minutes, depending on the scope of the site visit. The meeting will be facilitated by the CFCHS Monitoring Team Lead which is the CFCHS Contract Manager. The entire CFCHS Monitoring Team will be present for the exit conference. The main purpose of the meeting will be to summarize the strengths and weaknesses discovered during the site visit, provide opportunity for any final questions and answers, and to discuss a timeline for next steps.
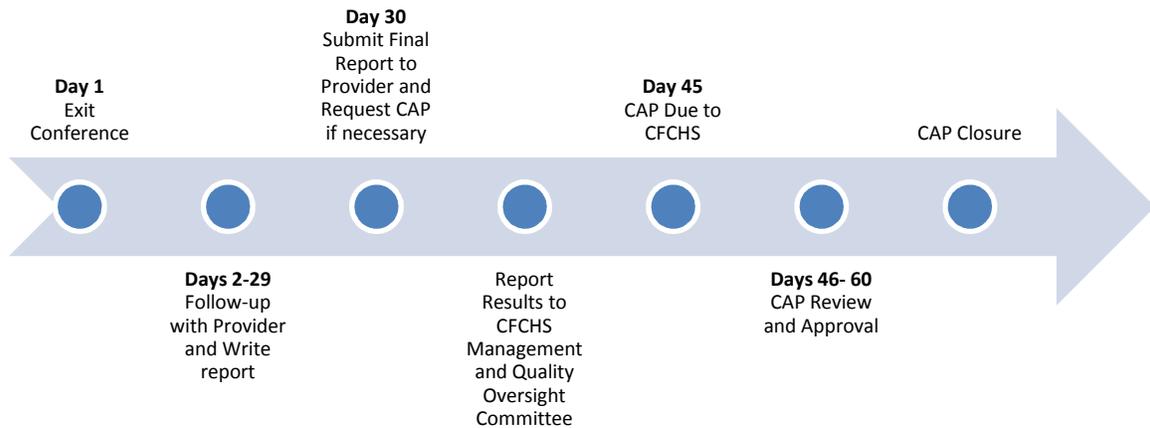
Activities expected of the single point of contact at this stage include:

- Assemble pertinent provider staff for the Exit Conference.
- Coordinate with the CFCHS Contract Manager in terms of all post-site visit activities.

POST-SITE VISIT ACTIVITIES

After the Exit Conference, the Lead will conduct the following activities off-site:

- Meet with the monitoring team to ensure all work papers are understood
- Write the report
- Follow-up with the provider on any issues that can be resolved during the report writing period
- Deliver the report to the provider within 30 calendar days of the exit conference
- Request provider response to the report within 14 calendar days of receipt of report
- Follow-up as needed and report results to CFCHS Management Team and Quality Oversight Committee.

Day 1
Exit Conference

Day 30
Submit Final Report to Provider and Request CAP if necessary

Day 45
CAP Due to CFCHS

CAP Closure

Days 2-29
Follow-up with Provider and Write report

Report Results to CFCHS Management and Quality Oversight Committee

Days 46- 60
CAP Review and Approval

REQUIREMENTS

All Network Providers are required to abide by the following[3] and compliance will be tested during the site visit:

- The contract between CFCHS and the provider
- Contract GHME1 and all amendments which can be found at http://www.myflfamilies.com/service-programs/substance-abuse/managing-entities/contracts
- The submitted and approved Provider Program Description
- 65E-14, F.A.C.

ADMINISTRATIVE CODE HYPERLINKS

Below is a listing of the Florida Administrative Codes that apply to the Department of Children and Families funded programs. Copies of these rules may be obtained by clicking on the hyperlinks in the "Chapter No." column or from the Department of State website (https://www.flrules.org/default.asp).

Chapter No.	Chapter Title	Rule Count
65E-4	COMMUNITY MENTAL HEALTH REGULATION	2
65E-5	MENTAL HEALTH ACT REGULATION	44
65E-9	Licensure of Residential Treatment Centers	14
65E-10	PSYCHOTIC AND EMOTIONALLY DISTURBED CHILDREN - PURCHASE OF RESIDENTIAL SERVICES RULES	6
65E-11	BEHAVIORAL HEALTH SERVICES (TITLE XXI)	7
65E-12	PUBLIC MENTAL HEALTH CRISIS STABILIZATION UNITS AND SHORT-TERM RESIDENTIAL TREATMENT PROGRAMS	8
65E-14	COMMUNITY SUBSTANCE ABUSE AND MENTAL HEALTH SERVICES - FINANCIAL RULES	17
65E-15	CONTINUITY OF CARE CASE MANAGEMENT	8
65E-16	Indigent Drug Program	0
65E-20	FORENSIC CLIENT SERVICES ACT REGULATION	13
65E-25	SEXUALLY VIOLENT PREDATOR PROGRAM	6
65E-26	SUBSTANCE ABUSE AND MENTAL HEALTH PRIORITY POPULATIONS AND SERVICES	2

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[3] This list is not to be construed as exhaustive of all required laws, rules, and regulations that a network provider must follow.

MONITORING TOOLS AND PROTOCOLS

FORMAT

Each Monitoring tool is labeled for the program or service being monitored[4].

Each monitoring tool contains a heading where the following information will be recorded by the monitoring team:

- Reviewer Name
- Date
- Provider Name

Each monitoring tool lists the reference and the standard to be tested for compliance. From left to right on each tool you will find the following columns:

- Citation: indicates the reference citation from law, rule, policy, or contract
- Standard: the verbiage of the citation to be tested during site visit
- Record 1, Record 2, Record N: these columns will be used by the monitoring team to document a record identifier and compliance status with the standard.

SCORING

Compliance with each standard will be scored using the following point system:

- Yes = 1 point
- No = 0 points
- N/A = will not be figured into the denominator of the total score

Compliance rate for an individual tool will be calculated as follows:

1. Sum the points earned for each standard
2. Divide the total points earned by the number of standards applicable

Thresholds:

- 85% or above – full compliance
- 84% or below – requires a corrective action plan

Any deficiencies discovered during the site visit that affect client safety will require immediate corrective action by the network provider.

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[4] See Appendix B

APPENDICES

Appendix A – CFCHS Policies
1. Subcontractor Risk Assessment
2. Subcontractor Monitoring

Appendix B – CFCHS Monitoring Tools
1. For all providers:
    a. Administrative/Facility
    b. Policies and procedures
    c. Background screening
    d. Service Validation
    e. Section 504/ADA
    f. Client and Staff Interviews
2. Program specific:
    a. Assisted Living Facilities with a Limited Health License (ALF-LMHL)
    b. Florida Assertive Community Team (FACT)
    c. Forensic
    d. Temporary Assistance for Needy Families (TANF)
    e. Family Intervention Specialist (FIS)
    f. Federal Substance Abuse Prevention and Treatment Block Grant Compliance
    g. Services to Persons with Co-Occurring Disorders
    h. Trauma-Informed Care