



Policy Title: Subcontractor Monitoring		
Department: Compliance		
Date Issued: 12/07/2021	Revised Date: 12/07/2021 Review Date: 03/07/2024	
CEO Approval: 	Effective Date: _____9/22/2024_____	

POLICY:

It is the policy of Central Florida Cares Health System, Inc. (CFCHS) to provide a mechanism for evaluating Subcontractor’s accuracy, delivery of quality service, and integrity through a comprehensive monitoring process.

RELATED POLICIES:

- Subcontractor Risk Assessment
- Subcontractor Compliance and Performance Improvement
- Network Management Plan
- Compliance Program-Fraud, Waste, and Abuse (FWA) Plan

PROCEDURES:

CFCHS performs various monitoring reviews which occur at periodic intervals using a variety of processes to include at a minimum:

1. Desk Reviews

Information is collected through a multi-tiered departmental coordination within CFCHS. As outlined below, several review mechanisms are utilized within various departments thus creating an ongoing holistic approach to the desk review process. Frequency of reviews may be monthly, quarterly, or annually depending on the area of review. Desk Reviews do not require formal reports to the Subcontractor as they are ongoing in nature and used as technical assistance for the Subcontractor. Department reviews include, but are not limited to:

- a. The Finance Department
 - i. Calculation and analysis of financial ratios
 - ii. Cost allocation plans
 - iii. Independent financial audits
 - iv. Audit schedules
- b. The Data Department
 - i. Security agreement forms and training certificates.
 - ii. Monthly data and error reports.
 - iii. Generate and distribute Subcontractor Exception reports.
 - iv. Track Subcontractor attestation of data included in Exception reports.
 - v. Performance measure status.

- c. The Compliance Department
 - i. Formal complaints and/or grievances
 - ii. Incident Reports
 - iii. Person Served Satisfaction Surveys
 - iv. Auxiliary Aid Service Records
 - v. U.S. Department of Health and Human Services (HHS) Compliance
 - vi. Incidental Pre-authorizations
 - vii. National Voter Registration Act (NVRA) reports
- d. The Operations Department
 - i. Fiscal reports
 - ii. Local match plans
 - iii. Sliding fee scales
 - iv. Accreditation reports
 - v. Insurance certificates
 - vi. Representative Payee accounting documentation
 - vii. Monthly invoices, burn rates, and invoice support reports.
 - viii. Monitoring Reports and Corrective Action Plans
- e. The System of Care Department
 - i. Program descriptions
 - ii. Evidenced Based Practice (EBP) reports.
 - iii. Project for Assistance in Transition from (PATH) Intended Use applications and Annual Reports
 - iv. Review of Florida Assertive Community Treatment (FACT) quarterly and monthly reports
 - v. Review of Adult Mental Health State Hospital reports (civil and forensic)

Issues and concerns are discussed during the monthly CFCHS dashboard meetings, as needed. Subcontractors will be notified of deficiencies as discovered, Technical Assistance and training sessions are provided as needed. Corrective action plans may be requested after technical assistance and/or training sessions fail to correct deficiencies. Immediate corrective action is required if person served safety or Fraud, Waste, or Abuse (FWA) is determined in accordance with pertinent policies, rules, and regulations.

2. Service Validation

Monitoring specific to Service Validation may be completed via desk review or on site.

The processes are as follows:

- a. Review covered services submitted into CFCHS' data system by Subcontractor.
- b. Select covered services for service validation.
- c. Submit a written request for audit documentation from Subcontractor to validate services.
- d. Utilize appropriate Service Validation tool for covered service being reviewed.
- e. Document any inability to validate services.
- f. Include any findings or pertinent concerns or comments in the Monitoring Report.

Contract Managers review data and support documentation for covered services for select periods and ensure that correct payment is rendered. Contract Managers may request person served files and additional support documentation to validate services based on the measurement of service as defined in Florida Administrative Code (F.A.C.) 65E-14.021. CFCHS

may reduce the amount of the future monthly payments or request reimbursement if substantial evidence of the Subcontractor's non-delivery of services is found. This process includes preparing written findings substantiating the Subcontractor's failure to deliver services, notifying the Subcontractor of the proposed reduction, and providing an opportunity for discussion of the proposed reduction in payment. The amount of any reduction shall be based upon the costs of those services, pursuant to the contract, not provided during the payment period.

3. Regulatory, Programmatic, and Contract Compliance – On-Site Monitoring Virtual or Face to Face.

CFCHS monitors its Subcontractor 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 the first quarter of each state fiscal year. Monitoring tools and the Monitoring Handbook for Network Providers are available on CFCHS' website to assist Subcontractors in understanding the monitoring process and planning operations to be successful in complying with requirements.

a. Monitoring tools to be used for all Subcontractors, regardless of service provided may include:

- i. Administrative / Policies and procedures
- ii. Human Resources
- iii. Service Validation
- iv. Auxiliary Aid
- v. Incident Reporting
- vi. Person Served and Employee Interviews
- vii. HIPAA Security and Privacy

b. Program specific tools used based on services provided may include:

- i. Mental Health Person Served Record
- ii. Mental Health Residential Treatment
- iii. Crisis Stabilization / Short-Term Residential Treatment
- iv. Assisted Living Facilities with a Limited Health License (ALF-LMHL)
- v. Florida Assertive Community Team (FACT)
- vi. Civil / Forensic Case Management
- vii. Temporary Assistance for Needy Families (TANF)
- viii. Substance Use State Licensed Programs
- ix. Family Intensive Treatment Team (FITT)
- x. Federal Substance Use Prevention and Treatment Block Grant Compliance
- xi. Behavioral Health Network (BNET)
- xii. Care Coordination
- xiii. Community Action Treatment (CAT) Team
- xiv. Mobile Response Team (MRT)
- xv. Project for Assistance in Transition from Homelessness (PATH)
- xvi. Outcomes
- xvii. Recovery Oriented System of Care (ROSC) Services
- xviii. NAVIGATE Model Fidelity
- xix. Behavioral Health Consultant (BHC) for Substance Use
- xx. Service Validation

- c. Preliminary Activities
 - i. CFCHS Compliance Director takes the lead and assembles a monitoring team based on the predetermined scope.
 - ii. Develop an agenda.
 - iii. Notify the Subcontractor of dates, times, and agenda for the on-site visit. The Compliance Director has the authority to reschedule as deemed necessary.
 - iv. Schedules a Pre-Monitoring Technical Assistance Videocall to explain the monitoring process timeline and coordinate details for each area of the scope.
 - v. The Contract Manager assigned to the Subcontractor will obtain and review any external monitoring, licensure, and/or accreditation reports from reviews conducted within the past 12-24 months.
- d. On-site Monitoring Activities are outlined in detail in the Subcontractor Monitoring Handbook
 - i. Conduct entrance conference.
 - ii. Monitor using appropriate tools.
 - iii. Adjust scope if unexpected issues arise during monitoring.
 - iv. Communicate frequently with Subcontractor employees during the monitoring and provide technical assistance as needed.
 - v. Provide daily summary progress report.
 - vi. Conduct exit conference.
- e. Reporting activities are outlined in detail in the Subcontractor Monitoring Handbook
 - i. Monitoring team will summarize findings in the tool used to conduct review, describing any necessary corrective action.
 - ii. Communicate findings and observations with Subcontractor.
 - iii. Provide technical assistance.
 - iv. Prepare Monitoring Report using complete tools from monitoring team.
 - v. Route internally for Chief Operating Officer's approval.
 - vi. Deliver the Monitoring Report to the Subcontractor within 30 calendar days of the exit conference, unless otherwise established due to extenuating circumstances.
 - vii. Request Subcontractor response to any necessary corrective action plan (CAP) within 30 calendar days of receipt of report (Exceptions to the deadline will be considered on an individual basis.)
 - viii. Follow-up with CAP and report results to CFCHS' management team and the Compliance/Quality Improvement Committee.

4. Performance Measure Compliance

CFCHS has established procedures to ensure all Subcontractors meet or exceed the GAA Performance Outcome Measurement targets identified in the contract between CFCHS and the Florida Department of Children and Families (Department). Reviews occur monthly on 100% of the Subcontractor.

- a. CFCHS' Data Department will generate monthly internal data reports to identify and monitor compliance with performance outcome measures. The reports specify agency, Subcontractor's specific programs, and outcome measures to identify areas that may require technical assistance. The reports will be presented to the Board Compliance/Quality Improvement Committee and at each regularly scheduled internal dashboard meeting.

- b. CFCHS' Contract Manager will act as the main point of contact when resolving performance issues with Subcontractors. Other CFCHS departments will participate as needed.
 - c. CFCHS will contact the Subcontractor that fails to meet specific targets to discuss possible problems, barriers, and identify solutions. The Data or Compliance Departments may be asked to assist the Subcontractor in improving outcomes.
 - d. Technical assistance will be provided as needed to assist Subcontractors in meeting targets.
 - e. If technical assistance fails to remedy unsatisfactory performance for two (2) consecutive months, a notice of non-compliance will be issued, and the Subcontractor Compliance and Performance Improvement policy will be enacted.
5. Special Monitoring Process
- a. CFCHS may conduct a special monitoring based on factors that may impact quality of care (e.g., significant changes in access to care, service provision, trends noted in incident reports, grievances, etc.) or at the request of the Department or another agency. Special monitoring visits must be approved by CFCHS' management team. Special monitoring visits generally have a more specific focus and may, or may not, utilize the standard monitoring tools.
 - b. A special monitoring report will be prepared and submitted to the Subcontractor and the Department within 30 days of the completion of the monitoring.
6. Fraud, Waste, and Abuse (FWA)
- FWA prevention and detection monitoring is described in detail in the Compliance Program FWA Plan.