

Effective Date: 11/23/2005; 10/9/2003, Approved by BOD, Motion #03-055
Revised Date: 12/19/2016
Review Date: 3/20/2017

North Sound Behavioral Health Organization

Section 5000 – Contract: Administrative Contract Compliance Monitoring

Authorizing Source: DBHR Contract

Cancels:

See Also:

Providers must comply with this policy and may develop
Individualized implementation guidelines as needed

Responsible Staff: Contracts Manager

Executive Director Signature:

Approved by: Board of Directors

Motion #: 03-055

Date: 10/9/2003

Date: 3/20/2017

POLICY #5001.00

SUBJECT: ADMINISTRATIVE CONTRACT COMPLIANCE MONITORING

POLICY

All agencies providing services to or on behalf of North Sound Behavioral Health Organization (North Sound BHO) will be monitored for administrative, fiscal, and quality management systems assurance/improvement compliance. Whenever possible, North Sound BHO will collaborate and coordinate with State of Washington Division of Behavioral Health and Recovery (DBHR) to jointly conduct North Sound BHO's Administrative and Clinical Reviews with DBHR's Licensing Reviews of North Sound BHO contracted providers.

PURPOSE

The purpose of conducting an on-site review is to ensure contracted providers and their subcontractors are providing services in compliance with:

1. North Sound BHO Contract(s);
2. Washington Administrative Codes (WAC's);
3. Revised Codes of Washington (RCW's);
4. Washington State Medicaid Waiver; and
5. Federal Rules and Regulations (i.e., HIPAA, HI-TECH, Compliance), etc.).

This review is a limited review and the primary purpose is to ensure compliance with the terms of the contract the provider agency has with North Sound BHO. This on-site review is not a clinical review. Clinical reviews are conducted by North Sound BHO Clinical Oversight Team. The Administrative review is limited in scope. It is not intended to encompass all areas that are covered under a DBHR licensing review; however, findings and recommendations will be reported to DBHR to assist them. Conversely, findings and recommendations from DBHR will be reviewed during the North Sound BHO on-site review. It is not intended to encompass all federal, state and local laws and regulations that may apply to a provider agency, its primary focus is to ensure compliance with those laws and regulations that govern the contract between North Sound BHO and the agency. If North Sound BHO becomes aware of a potential legal violation that is outside of the scope of the review, North Sound BHO will report the alleged violation to the appropriate authorities.

ON-SITE REVIEW TEAM

The Administrative On-site Review Team shall be made up of one (1) or more of the following:

1. Contracts/HR Manager;
2. Contracts Specialist;
3. HR Specialist;
4. Compliance/Privacy Officer;
5. Fiscal Officer;
6. Quality Specialist; and/or
7. Quality Manager/Coordinator.

ON-SITE MONITORING COMPONENTS

The following risk factors shall be analyzed prior to the on-site review to determine the extent of the Administrative Review.

1. Frequency of outside reviews;
2. State DBHR Licensing Review Results;
3. Prior North Sound BHO review findings;
4. Current national accreditation or certification (i.e., JACHO, CARF, NCQA, other);
5. Responsibilities required under North Sound BHO's contract with DBHR that the agency is performing under its contract with North Sound BHO;
6. RCW, WAC and other state requirements North Sound BHO is required to ensure the fulfillment of through its contract with DBHR and the agency is performing under its contract with North Sound BHO;
7. Federal requirements North Sound BHO is required to ensure the fulfillment of through its contract with DBHR and the agency is performing under its contract with North Sound BHO;
8. Date of the last monitoring visit;
9. Type of contract;
10. History of marginal performance;
11. Prior review findings; and
12. Unusual personnel turnover.

The individual components of the Administrative On-site Review consist of the following:

1. Administrative Review

- a. Contract General Terms and Conditions
- b. Benefits Package or Statement of Work Requirements
- c. Performance Standards
- d. Personnel Policies
- e. Personnel Records, in order to ensure that the agency has an appropriate credentialing process.
- f. Compliance Program
- g. Posting of Required Materials
- h. Interpretation/Translation Logs
- i. Board meeting minutes, for indications of problem areas

2. Fiscal Review

- a. Review of agency fiscal policies and procedures
- b. Review of the financial system
- c. Review of documentation relative to the tracking of all revenue awarded by North Sound BHO.
- d. Review of documentation related to identifying, pursuing and recording Third Party Revenue, including collections and write-offs.
- e. Eligibility Verification process
- f. Desk review of the contractor's annual review report, with particular attention to any notes that indicate issues with financial viability and stability;
- g. The following risk factors shall be analyzed prior to the On-site Review in order to determine the extent of the Fiscal Review:
 - i. Prior review findings;
 - ii. Date of the last monitoring visit;
 - iii. Type of contract;
 - iv. Dollar amount of contract;
 - v. Internal control structure;
 - vi. Review of Agency's accounting system
 - vii. Review of Agency's most recent Independent Financial Audit
 - viii. If a sub-recipient, Length of time as a sub-recipient;
 - ix. Has not provided North Sound BHO with required Financial Reports on a timely basis;
 - x. Has not conformed to conditions of previous contracts.

3. Quality Assurance/Improvement

- a. Review of Agency's internal quality assurance, quality improvement systems, and peer review systems policies and procedures,
- b. Agency Internal Complaints Process
- c. Ombuds Grievances

ON-SITE MONITORING PROCESS

An onsite review shall be accomplished by following the steps outlined below:

1. 30 days prior to the scheduled on-site visit, North Sound BHO shall send the following to the provider:
 - a. Administrative Monitoring Questionnaire;
 - b. Personnel Records Review Worksheet;
 - c. On-site Review Checklist; and
 - d. On-site Schedule and Agenda.

2. On the first scheduled day of the site visit, an entrance interview with the agency director and his/her designee(s) shall occur. The entrance interview consists of the following:
 - a. Introductions – Identify for Agency which North Sound BHO Review Team Member will be reviewing each on-site component;
 - b. Sign Confidentiality Statements (when applicable);
 - c. North Sound BHO Re-State Purpose of On-site Review;
 - d. Review On-site Schedule;
 - e. Give Agency staff an opportunity to present a description of the various programs they provide through North Sound BHO contract(s); and
 - f. Tour of Agency Facility.
3. North Sound BHO Review Team shall reconvene as a group at least two (2) hours prior to the scheduled Exit Review to share the results of their monitoring efforts.
4. North Sound BHO Review Team shall conduct an exit interview with agency director and his/her designated staff. At the exit review the following will be presented and discussed:
 - a. Areas of excellence,
 - b. Areas of strengths,
 - c. Areas in need of corrective action (findings), and
 - d. Recommendations.
5. Once the on-site review is completed, a written On-Site Review Report will be prepared.
 - a. Each North Sound BHO Review Team participant will prepare a written report documenting areas of excellence, strength, findings and recommendations of the section(s) their team reviewed; Administration, Fiscal and Quality Management.
 - b. This documentation shall be submitted to the Contracts Manager who shall be responsible for finalizing the report.
 - c. The completed report shall be submitted to the Executive Director of the contract agency within 45 days of the exit review date.
 - d. The report consists of four (4) sections:
 - i. Scope of review;
 - ii. Summary of review;
 - iii. Findings and Recommendations, and
 - iv. Corrective action plan request and timeline.

The agency will have 30 days to respond in writing to all findings and recommendations.

6. North Sound BHO Review Team will review the agency's Corrective Action Plan to the findings and recommendations and provide a written response to the contract agency of those areas of correction that are acceptable and those areas that are unacceptable within 45 days of receipt.

7. When an agency's response has areas that are unacceptable, North Sound BHO Review Team will inform the agency in writing and request further action.
8. The Contract agency will be responsible and accountable for correcting all findings.

Failure of a provider to correct findings may result in North Sound BHO imposing sanctions and/or withholding payment(s) until the finding in question is resolved to the satisfaction of North Sound BHO.

The Monitoring Report and Response becomes a permanent part of the provider's file.

ATTACHMENTS

None