

PROCEDURE

Series: Operating Procedures **COA: NET 6.03**
CFOP: 75

Procedure Name: BFP Performance and Contract Compliance Monitoring
Procedure Number: OP 1205
Reviewed Date: 03/29/19, 05/01/2020
Revision Date: 07/03/18
Effective Date: 01/17/17

Applicable to: BFP FOA staff and its subcontracted agencies

PURPOSE: The purpose of this policy is to outline the process that Community Based Care Integrated Health (CBCIH) has implemented to effectively monitor the activities conducted by Brevard Family Partnership as part of the overall implementation and coordination of activities related to the Child Welfare Specialty Plan.

PROCEDURE:

Cross Reference(s)

Sunshine Health Quality Improvement Program

Scope

This operating procedure applies to all Brevard Family Partnership FOA staff and its subcontractors with children enrolled in the Child Welfare Specialty Plan. If any of the responsibilities outlined in this procedure are contracted with an individual or other entity, the contracted provider must ensure compliance with this procedure and the terms will be incorporated into the contract

Key Terms

CBCIH Regional Coordinator—individuals employed by CBCIH who provide consultation and technical support, related to the Child Welfare Specialty Plan, to Community Based Care Lead Agencies.

Child Welfare Specialty Plan Enrollee—a child who is Medicaid eligible and is enrolled in the Sunshine Health, Child Welfare Specialty Plan, or the Sunshine Health Managed Medical Assistance Plan (MMA), due to an active status in the child welfare system of care. This includes children who have an open child welfare case, those who have been adopted and are receiving maintenance adoption subsidy and those who are receiving extended foster care or independent living services.

Community Based Care Lead Agency—an “eligible lead community-based provider” as defined in Section 409.1671(1)(e), F.S.

HEDIS (Healthcare Effectiveness Data and Information Set)—a set of standardized performance measures developed by the National Committee for Quality Assurance (NCQA) which allows direct, objective comparison of quality across health plans. NCQA develops the HEDIS measures

through a committee represented by purchasers, consumers, health plans, health care providers and policy makers. HEDIS allows for standardized measurement, standardized reporting and accurate, objective side-by-side comparisons.

Medicaid—a program authorized by Title XIX of the Social Security Act. It is a state-administered health insurance program that is jointly funded by the Federal and State governments. Medicaid is an open-ended entitlement program, with states receiving federal reimbursement for every eligible claim they submit. Medicaid, as defined in Rule 59G-1.010, F.A.C., includes eligibility based on income for most groups using Modified Adjusted Gross Income (MAGI).

Standards

CBCIH conducts regularly scheduled monitoring of each CBC Lead Agency to assess compliance with the contract. Monitoring activities are conducted by the CBCIH Regional Coordinators and the CBCIH Contract Compliance Manager and are designed to assess the care coordination efforts of the CBC as well as to identify opportunities for improvement. In that effort, CBCIH is available to provide technical assistance to each CBC Lead Agency via written report and other methods of communication including regular meetings, on-site visits and conference calls.

I. CBC Lead Agency Monitoring and Performance

- A. The CBCIH Regional Coordinators are responsible for conducting on-site quarterly monitoring of each CBC Lead Agency to determine the adequacy of processes developed by each CBC Lead Agency related to the management and coordination of services as part of the Sunshine Health, Child Welfare Specialty Plan.
- B. A tracking log is maintained by the CBCIH Contract Compliance Manager via the CBCIH-CBC Lead Agency Annual Monitoring Schedule and Summary, to include:
 - Monitoring dates, by CBCIH region
 - Status of the monitoring visit (pending date or completed)
 - Assessment of compliance
 - Corrective Action Plan status, if indicated

This information is reported to Sunshine Health on a quarterly basis, in accordance with the Sunshine Health Vendor Agreement's reporting requirements.

- C. A CBC Lead Agency Monitoring Tool has been developed in order to assess each CBC Lead Agency's ongoing compliance with contract requirements, as specified within the Sunshine Health Vendor Agreement as they relate to Healthcare Management Functions:
 - Enrollment
 - Communication and Training
 - Care Coordination
 - Utilization Management
 - Pharmacy
 - Quality Improvement
 - Network Management
- D. The monitoring process also includes an assessment of each CBC Lead Agency's progress regarding measured services and performance goals (HEDIS). The BFP Healthcare Data Management Clerk or designee will ensure satisfactory performance in meeting HEDIS measures by assisting with the coordination and scheduling of required appointments to include obtaining supporting documentation. This assessment also includes discussion related to identified barriers that the CBC Lead Agencies have encountered in their attempt to achieve the specified measures.

- E. Upon completion of the monitoring visit, a monitoring report will be completed and submitted to the CBCIH Director of Operations and the CBCIH Vice President of Operations for review.
- F. CBCIH monitoring of BFP shall include a discussion of preliminary findings upon the conclusion of the visit, at which time general issues will be discussed and recommendations for improvements shall be made. BFP is also provided with written feedback, detailing any deficiencies that were noted and corrective actions that are required, including time frames for completion of these actions.
- G. If the deficiencies that are noted warrant a formal Corrective Action Plan, the report will identify the items requiring improvement and will provide a due date for the CAP. Follow-up action will be taken, which may include a subsequent monitoring visit, to assess BFP's progress towards the specified corrective actions.
- H. The report will be forwarded to the BFP CEO for distribution within the CBC and forwarded to the CBCIH Contract Compliance Manager for submission to Sunshine Health in accordance with the Sunshine Health Vendor Agreement.

II. **Communication of Information and Technical Support**

- A. CBCIH Regional Coordinators provide frequent assistance and technical support and have regular, ongoing communication with Behavioral Health Care and Nurse Care Coordinators.
- B. CBCIH conducts meetings with BFP, Behavioral Health Care and Nurse Care Coordinators, on a regular basis, in an effort to ensure ongoing compliance with service and care coordination activities, policies and procedures.
- C. Bi-weekly regional meetings with Behavioral Health Care Coordinators, Nurse Care Coordinators and monthly regional meetings with Post-Adoption staff to discuss regional issues and to disseminate specific information related to each program area.
- D. CBCIH Regional Coordinators host a quarterly meeting to provide Child Welfare Specialty Plan updates and to discuss processes, issues and best practices. Attendance by BFP's Behavioral Health Care and Nurse Care Coordinator is mandatory. The meeting schedule and agenda will be provided in advance of the meeting date.

BY DIRECTION OF THE CHIEF EXECUTIVE OFFICER:



PHILIP J. SCARPELLI
Chief Executive Officer
Brevard Family Partnership Family of Agencies

APPROVAL DATE: 9/3/2020