

Series: Contracts and Grants **COA:** RPM10, RPM 2.01(d)

Procedure Name: Contract Monitoring
Procedure Number: CG-301
Revision #/Date: (2)12/2/08
Effective Date: 12/31/08

Applicable to: All CBCB Staff and Contract Providers

SUBJECT: Contract Monitoring

PURPOSE: This policy describes the monitoring requirements and monitoring process for contracts with Community Based Care of Brevard (CBCB). The purpose of contract monitoring is to ensure that contract service providers meet all contract administrative and programmatic standards and requirements.

PROCEDURE:

References

CBCB Policies and Procedures: GOV202, GOV203, RQ505

Scope

Contract monitoring is the review and reporting of contract service provider's compliance with the contract terms and conditions, licensing requirements, performance standards, applicable State statutes and administrative codes, Federal regulations, and CBCB policies. The goals of the monitoring process are to manage risk, support the efficient and effective implementation of quality services, document compliance with appropriate regulations, and to insure that program performance and financial requirements are met. CBCB will also monitor the organizations progress towards meeting the Council on Accreditation standards.

Informal Site Visits: Informal site visits to the service provider provide an opportunity for CBCB staff to become familiar with the agency's staff and programs and to inspect facilities. Informal site visits may be announced or unannounced and may be conducted by anyone on the CBCB staff. Informal site visits should be documented with a memo to be placed in the contract file

Preparation: Within 60 days of executing a contract, a risk assessment will be done to determine the type of contract monitoring appropriate for each service provider. The risk assessment considers the dollar value of the contract, contract history and prior performance, tenure of senior management staff, consumer satisfaction and complaints. Each provider will be identified as low, moderate or high risk using the Service Provider Risk Assessment Form (attached). Reference procedure RM-505, Risk Assessment Process.

The CBCB Contract Manager will develop an annual monitoring schedule. The Contract Manager will review the agency's contract file in order to prepare for the on site visit and to check the

required documents to ensure they are complete and have not expired. The Contract Manager will identify additional staff members to participate in the monitoring as a team. For example, if there are financial concerns, the Chief Financial Officer or their designee may be asked to review the financial records. The monitoring team will meet in advance to define each person's roles and responsibilities and to identify a team leader as the spokesperson and coordinator for the monitoring visit.

At least 15 working days in advance, the Contract Manager will notify the agency's lead staff person of the upcoming monitoring. A formal written notification will be sent and will confirm the CBCB staff that will participate, the review date(s) and time(s), outline the monitoring process to be used based on the risk analysis, list the written documentation needed for review during the visit, and identify the staff requested to be available for interview.

Monitoring Site Visit: The monitoring team will meet with agency staff for an entrance conference. Agency staff should include members of the senior management team and representation from the Board of Directors. The purpose, scope and monitoring schedule will be reviewed and any concerns identified during the risk analysis or file review will be discussed.

The agency will be asked to provide the monitoring team with a private place to work where they can review the documentation requested. Visits to different offices or rooms within the agency may be required to view secure records, conduct interviews or observe programs. Some members of the team may examine administrative records such as certifications; incorporation, licensing and accreditation documents; insurance records; financial reports; and personnel files. Other team members will evaluate program records and performance standards identified in the Scope of Work. The extent of the review will be based on the risk analysis.

Low Risk	Verify that the provider is complying with contractual requirements, view programmatic and financial records, look at the data collection process used to complete reports, conduct staff interviews, and when possible, observe programs.
Moderate Risk	In addition to the suggested items above, discuss concerns and review records associated with the concerns identified in the risk analysis, verify that prior findings or concerns have been addressed.
High Risk	Conduct a comprehensive review of record keeping and reports, financial data, management records, and personnel files, conduct interview with management, service staff, address prior complaints and findings, discuss corrective action required.

Regardless of risk, all subcontracted providers will receive an on-site annual monitoring. Monitors will utilize the contract-specific monitoring tool specified by contract type located in the Monitoring Tool Depository on the CBCB Shared Drive for review of programmatic contract requirements. In addition, monitors will review any other applicable reports (i.e. licensing reports) pertaining to the contract for the period under review and this review shall be detailed in the monitoring report.

Team members will meet at the end of the visit to review notes and conclusions, in preparation for an Exit Conference. The team will present preliminary results to senior management. Agency staff will be given an opportunity to provide additional information to clarify or support their position and, if needed, begin discussing any corrective actions to address identified concerns.

Monitoring Report: Within thirty (30) calendar days of the monitoring visit, the Contract Manager will send a written summary of the monitoring results. The report should include recognition of strengths, accomplishments and successes, and identifying any challenges observed. Findings

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and concerns should be clearly outlined with specific deadlines for a written response and required corrective actions. Monitoring Reports may be forwarded to the organization via confirmed e-mail in order to expedite receipt followed by certified mail delivery. Copies of all monitoring reports will be kept in the contract file and a copy sent to the DCF Contract Manager.

Findings are supported by local, state, or federal regulations, or by the terms and conditions of the contract and are mandated to be corrected by an identified deadline. There may be instances where payments may be withheld pending receipt of a response from the agency due to the severity of findings. Concerns are situations that do not require correction by regulation but come as a suggestion from the monitoring team that will help to improve agency performance.

Corrective Action: If a response is not received by the deadline, a telephone call and an informal written communication documenting the call will be made to the service provider within five (5) working days of the deadline to request a response.

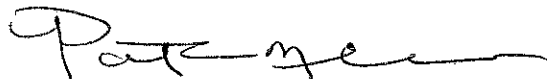
If a response is not received as a result of the informal follow-up within three (3) business days, a certified letter will be mailed to the agency informing them of the consequences for continued lack of response. The contract manager will recommend sanctions to CBCB senior management for approval that may include:

- Imposing probationary status
- Restriction of payment requests
- Disallowance of certain expenses
- Requiring repayment to CBCB
- Suspending participation in future funding programs
- Cancellation of the contract
- Initiation of legal action
- Other appropriate action in response to the findings

The agency will be notified in writing by certified mail of any sanctions to be imposed. The letter will be signed by a member of the CBCB senior management team.

Technical Assistance: CBCB may offer technical assistance through one-on-one consultations, orientations for new service providers, small work groups to address common issues, or trainings open to all members of the Provider Network. Technical assistance will be made available to members of the Provider Network at all times except when there is a Request for Proposals (RFP) or Invitation to Negotiate (ITN) in process.

BY DIRECTION OF THE CHIEF EXECUTIVE OFFICER:



DR. PATRICIA NELLIUS-GUTHRIE
Chief Executive Officer
CBC of Brevard, Inc.

APPROVAL DATE: 3/2/09

Service Provider Risk Assessment Form

Name of organization:		Federal ID#:
Lead Staff Person in Brevard County:		Title:
Phone:	Fax:	Email:
Provider Network Contact Name:		Title:
Phone:	Fax:	Email:
Contract number: #	Contract amount: \$	Start and end dates: / / to / /

Low Risk

- Has submitted timely, accurate and complete Reports and is meeting Performance Standards
- Has submitted timely, accurate and complete Requests for Reimbursement
- Has had no change in senior management
- Has presented positive results from a consumer satisfaction survey
- Has had no complaints filed with CBCB
- Has successfully completed one or more annual comprehensive reviews with no findings or concerns
- Is monitored by another (local, state or federal) funding agency and has provided CBCB with a monitoring report which demonstrates that the program is in compliance
- Has submitted a financial audit conducted by an independent auditor in accordance with Florida Statutes which demonstrates that the program is in compliance

Moderate Risk - If one or more of the following situations exists:

- Is not consistently submitting Reports or Requests for Reimbursement as scheduled
- Is not consistently meeting Performance Standards
- Has made a change in senior management
- Has presented fair results from a consumer satisfaction survey
- Has had a minor complaint filed with CBCB
- Is implementing corrective actions identified during a previous monitoring
- Has implemented a new program as part of the current contract
- Other relevant concerns:

High Risk - If one or more of the following situations exists:

- Unsatisfactory reporting or performance history
- Financial instability, negative audits, or poor fiscal reports
- High turnover in senior management
- Has not submitted consumer satisfaction survey results or has poor survey results
- Has had a serious complaint filed with CBCB
- Has not implemented corrective actions identified during a previous monitoring
- Is a new CBCB service provider
- Other relevant concerns:

Check risk level⇒	LOW	MEDIUM	HIGH
Signature:		Date:	
Printed name of person completing risk assessment:		Title:	
Signature:		Date:	
Printed name of person approving risk assessment:		Title:	