



Policy and Procedure

Section: Provider Relations

Subject: Managing Entity Provider Network Contract Management

Policy Number: PR 001, Contract Management Policy (former PR 002)

Effective Date: May 1, 2015

Revision Date: August 15, 2016; October 13, 2017

Review Date: September 17, 2018

Policy Statement:

This policy establishes procedures and standards for the process of managing the Provider Network, funded in whole or part by Florida Department of Children and Families (DCF) Substance Abuse and Mental Health dollars. This policy ensures adherence to the collection, maintenance, management and reporting of information related to all contractual transactions consistent with chapter 119, Florida Statute, and 287, Florida Statutes; and applicable Department of Financial Services Chief Financial Officer Memoranda and Uniform Grant Guidance 2 CFR §200. This will provide reasonable assurance that a comprehensive and accurate record is maintained for inspection at any time by any interested party; protection of the public funds it disburses; and ensure the maximum return of services from those funds.

Policy:

Contract management refers to the delineation of the procedures and duties related to the continuous management, oversight and communication with a Provider and to provide technical assistance; establish the minimum documents to be maintained in a contract file; the manner a contract file is maintained; and other contract related duties.

Procedures:

Contract Management involves several key processes, such as contracting with Providers, assessing risk for existing contracts, conducting monitoring activities for active contracts, maintenance of the contract file, and technical assistance.

- I. **Contract Managers** or specialists are assigned to each contract at the beginning of the fiscal year. The contract manager or specialist is responsible for:
 - a. Writing and executing the contract and amendments as applicable
 - b. Enforcing compliance with administrative and programmatic terms of the contract and requesting corrective actions for non-compliance
 - c. Maintaining the official contract file
 - d. Provide or coordinate technical assistance

- II. **Contract language** defines the expectation that Providers comply with all Federal and State requirements, data submission and outcome performance expectations, incident reporting policies, recipient eligibility requirements, and service delivery requirements.

III. **Contracting Process:** After each procurement process or renewal year, Contracting Process establishes the delineation of the procedures related to contracting processes after the procurement process or during the renewal year. The provider contract and any documents incorporated by reference establish the basis of accountability for provider performance and define the expectations for the delivery of quality services. Contracts are in compliance with applicable state and federal laws, rules, regulations, Department of Children and Families Operating Procedures/contract directives, as applicable (see PR 002 Contracting Process).

IV. **Assessing Risk:** The risk assessment uses predetermined factors to rank contracts. The factors weights and scoring will be evaluated and updated annually and will be applied uniformly throughout the network of providers. The results are considered in determining the order and frequency of on-site monitoring (see PR003 Risk Assessment Policy).

V. **Monitoring Activities:** Monitoring is typically performed by reviewing documents, interviewing individuals, and making observations. Information is analyzed by monitors and recorded on formally approved tools or other documentation. Providers are monitored on the compliance with contract terms and conditions, including requirements found in associated and referenced documents and in applicable laws, rules, regulations, and operating procedures.

The type of review will be determined by the level of risk and could be an onsite (see PR 004 Contract Accountability Review – onsite); or a desk review (see PR 005 Contract Accountability Desk Review). As per contract with Managing Entity, no less than 20% of the contracted Providers will have an onsite review. Accredited Providers will be monitored, at a minimum, every three years with limited scope monitoring reviews, as necessary, within the three year timeframe.

VI. **Core Review Elements:** The following elements shall be reviewed regularly with the approved Tools, as part of the monitoring activities:

- a. Personnel (following the DCF guidelines)
- b. Incident Reporting
- c. Service Validation
- d. CQI Policies and Plans
- e. Performance Outcome Measures
- f. Financial Management
- g. Credentialing of Assessors and Case Managers (as applicable)

VII. **Special Program Monitoring Activities:**

- a. **Substance Abuse Prevention and Treatment Block Grant (SAPTBG):** Provider may have SAPTBG funding. Whenever an onsite review is completed for a Provider with SAPTBG funding, a review of these services will be included. No less than 30% of the Providers with SAPTBG funding will be reviewed onsite every year.

These reviews will be completed in collaboration with the Data and Billing Department, the Concordia Team shall include an assessment of the provider's utilization of funds to serve priority populations (e.g., pregnant women, women with children, parent or caregiver with children, IV drug users); the provider's compliance in reporting services; and an assessment of the provider's implementation and adherence to its policies and procedures and training requirements. The results shall be captured in the Contract Accountability Review Report.



- b. **Limited Mental Health – Assisted Living Facilities (LMH-ALF):** Effective July 2014, the Contract Managers or specialists will consider Adult Mental Health case management as an increased risk. Furthermore, all Adult Mental Health case management providers will receive a Contract Accountability Review that specifically assesses the provider's compliance with chapter 394, Florida Statutes; chapter 429, Florida Statutes; and 58A-5. 029(2)(3), Florida Administrative Code. No less than 10% of the client reports as placed in LMH-ALF by the designated Providers will be monitored. The specific review elements are included in the **BBHC Mental Health Providers Serving Residents in Limited Mental Health Assisted Living** monitoring tool.

VIII. Maintenance of the Contract File: The Contract File includes all documents prepared and obtained as a result all contract-related activities. HIPAA protected and other confidential information shall be redacted to protect the client and/or staff member's identity. The Contract file shall be maintained electronically in SharePoint.

Electronic File Includes:

1. Invoices
2. Contract and amendments (to be uploaded within ten business days of the date of execution)
3. Contract Accountability Review Supporting Documentation and Report
4. Provider Reports (e.g. Hard of Hearing; Financial Reporting, MOUs)
5. Correspondence (as applicable)
6. Accreditation
7. Legal and Organizational (e.g., Provider approved subcontracts; Table of Organization; Insurance; Licenses);
8. Sliding Fee Scale
9. Other documents as applicable

(Contract files assigned by the Department of Children and Families may not contain all of the above information. When information is missing, requests will be made to the Department of Children and Families and/or the Provider during Review and daily contract management activities.)

IX. Technical Assistance: This is the providing of advice, assistance and/or training pertaining to the development, implementation, operations or compliance of any area of the contract. It may be necessary for technical assistance to be provided to the Provider to ensure actions are in compliance with the contract, are efficient and meaningful, and ensure the improvement of the service quality to the consumer.

Definitions: See PR Policy Definitions