



## Policy and Procedure

**Section:** Provider Relations

**Subject:** Contract Compliance

**Procedure:** PR 001.01, Conducting the Contract Accountability Review

**Related Policy:** PR 001, Contract Accountability Reviews

**Effective Date:** October 15, 2013

**Revision Date:** Original Publication

**Review Date:** Annual

**Policy Statement:** This policy establishes formal direction and procedures for Concordia staff and organizations contracted with the Managing Entity in activities related to conducting reviews of Provider performance. This procedure provides guidance in conducting the Contract Accountability Review (CAR), which may include review of Administrative and/or Programmatic contractual terms and conditions via an 1) Onsite; and/or Desk Review.

### I. Desk Review

- A. Pursuant to section 402.7305(4)(c), F.S., it is the policy of the Concordia Behavioral Health to conduct a Desk Review of Administrative and/or Programmatic compliance in advance of an Onsite Visit. In part, this is intended to maximize the use of staff time and resources and to limit the disruption to Provider operations inherent to an Onsite Visit.
- B. Elements of the Desk Review – While the Desk review may include Programmatic compliance, items typically reviewed during the Desk Review are Administrative. This include review of Provider policies and procedures; other funder monitoring and/or accreditation reports; report, data, and invoice submission performance; results of the Provider’s annual Audited Financial Statements; concerns raised by the ME; stakeholders; or clients and forwarded via the Quality Assurance and Utilization Management Department; and analysis of payer of last resort, utilization, and high costs/invoice validation. The Provider Relations Specialist shall brief the CAR Team of the results of the Desk review.
- C. Provider Document Request Log – the Provider Relations Specialist will include a document request with the notification of the CAR. The deadline and manner for submission shall be included, along with the reason for the document request; and the consequences for failure to submit the documents.

- D. Conducting the Desk Review – the Provider Relations Specialist shall review all documents submitted by the Provider. Any areas of concern shall be addressed with the Director of Provider Relations and the applicable department. Additionally, the Desk Review shall include analysis of the Data Versus Invoice (“DVI”) Report; the Concordia Business Application (“CBA”) Report; the Quarterly Incident Report Analysis; Complaints and Grievances investigated by Quality Assurance and Utilization Management; Provider compliance with the ME’s Utilization Management Program (as applicable); and Data Security Permissions; Exception; and Ad-Hoc reports. The Desk Review shall begin before the Onsite Review and may extend beyond the completion of the Onsite Review when approved by the Director of Provider Relations.
- E. Administrative Review for Providers with Multiple Contracts - when a Provider has more than one (1) contract, the Administrative Review shall factor all contracts.

## II. Onsite Review

- A. Entrance Conference – the Lead Reviewer, typically the assigned Provider Relations Specialist, and each member of the CAR Team will meet with the Provider’s representative(s) prior to the start of the CAR. The Provider may designate its representatives. The Entrance Conference shall include, at a minimum, the following items and be documented via a Sign-In Sheet:
  - 1. Introduction of CAR Team and Provider representatives;
  - 2. Purpose, scope, and schedule of the CAR;
  - 3. Expectations related to the CAR process (additional information needs; debriefings; exit processes; timeframes; and report of findings);
  - 4. Discussion of previous monitoring; accreditation reviews; quality assurance activities;
  - 5. Request for documentation not furnished in advance of the CAR; and
  - 6. Identify CAR Team roles; interview times; and tours.
- B. Identification of CAR instruments – prior to the Onsite Review and typically as a result of a Desk review, the Provider Relations Specialist shall determine the Scope of the CAR and the necessary instruments to be utilized by the CAR Team. Any deviation from the approved catalog of CAR instruments must be approved by the Director of Provider Relations.
- C. Maintenance of CAR Documents - the completed instrument is maintained in the CAR Working File and shall remain confidential unless all client-specific identifying information is redacted and reviewed by the Director of Provider Relations. Additional documents to be maintained in the Working File include: correspondence; planning documents including the Monitoring Plan; significant documents obtained through the CAR, and

other information to support findings; completed document request log(s) and exit log(s); and the reports referenced in the CAR Report.

- D. Roles and Responsibilities of the CAR Team - the Provider Relations Specialist will assign roles and responsibilities to each member of the CAR Team in advance of the Onsite Review and brief the Team on the instruments to be used. The Provider Relations Specialist shall also conduct a briefing with the Team of the following:
1. Impressions of the Provider's compliance with contractual terms and conditions based on ongoing management of the Provider's Contract;
  2. Results of the Desk Review;
  3. Impressions obtained from the ME; and members of Concordia's Quality; Data Management; Credentialing; Billing; and Utilization Management departments;
  4. Specific areas of concern identified via complaints; grievances; ME directive; and/or identified risks.
- E. Modifications to the CAR Scope - during the course of CAR, the Team may become aware of a compliance concern not originally included on the Monitoring Plan. The Provider Relations Specialist shall consult with the Director of Provider Relations to determine if additional activities are necessary and, if so, the extent of activities. Information about the compliance concern will be addressed with the Provider and included in briefings; Exit Conference; and the CAR Report.
- F. Referral of Findings - when a quality; financial; data area of non-compliance is identified, the Provider Relations Specialist shall notify the Director of Provider Relations. The Director of Provider Relations will relay the concern to the appropriate department and determine whether a representative shall join the CAR or schedule a separate review at a later date. Furthermore, the following findings shall be immediately reported to the CEO of the Managing Entity:
1. Misuse of funds;
  2. Threat to safety of clients; staff; or public; and/or
  3. Fraud or waste
- G. Exit Conference - the Exit Conference is conducted at the conclusion of the CAR and provides a summary of the scope; preliminary findings; and defines expectations for receipt of the CAR Report. The Provider Relations Specialist shall include appreciation to the Provider for its participation in the CAR and identify any areas of excellence. During this Conference, the Provider Relations Specialist shall ask the Provider if there is any additional documentation or information the Team has not factored that would impact the preliminary findings and if so, determine timeframes of submission of the documentation and/or information from the Provider. This period shall not exceed two (2) business days. The CAR Team shall also invite questions and/or concerns from the Provider.

**III. Approved CAR Instruments**

- A. Risk Assessment
- B. Level 1
- C. Background Screening
- D. Client File Review
- E. Case Management

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