



Policy: Contract Monitoring

ChildNet Number: CN 005.010

Original Approved Date: June 18, 2003

Revised Date(s): December 4, 2009; October 11, 2012

Sunset Date:

COA Standard(s): RPM 10.01, 10.02, and 10.04

Statement of Policy:

As ChildNet strives to procure and execute the most cost-effective contracts for services for the children and families we serve, it has in place a contract monitoring system to assure that ChildNet subcontractors ("providers") deliver the services for which they are being funded in an effective, appropriate, and efficient manner. The findings of the monitoring process to include performance improvement efforts are disseminated as appropriate to facilitate the delivery of the highest quality programs and practice.

Definitions:

Continuous Quality Improvement (CQI): is the complete process of identifying, describing, and analyzing strengths and problems and then testing, implementing, learning from, and revising solutions. CQI advances prudent use of resources, efficient, effective service delivery, and the achievement of strategic and program goals. It relies on an organizational culture that is proactive and supports continuous learning and is firmly grounded in the overall mission, vision, and values of the agency. Further, it is dependent upon the active inclusion and participation of staff at all levels of the agency, children, families and stakeholders throughout the process. CQI is not a time limited program or initiative, as it requires sustained and committed leadership.

Board Chair's Signature:

Date:

10/20/2012



Procedure: Contract Monitoring

ChildNet Number: CN 005.010 – Contract Monitoring

Original Approved Date: June 18, 2003

Procedure Revised Date(s): December 4, 2009; October 28, 2010; December 8, 2011; February 6, 2012, April 10, 2013; May 14, 2014; December 10, 2014, March 8, 2017, March 20, 2018; September 14, 2022

Procedure Sunset Date:

COA Standard(s): RPM 10.01, 10.02, and 10.04

Statement of Procedure:

This policy and procedure is to be used by the Service Quality Department and related departments for the purpose of executing contract monitoring of providers. In addition, for collateral Service Quality staff member responsibilities please refer to ChildNet's "Performance and Quality Improvement Plan."

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Introduction/Purpose

This procedure details ChildNet's plan and method to conduct contract monitoring objectively by avoiding conflicts of interest and including a standard to assess vital documents and elements.

Contract monitoring is performed routinely to ensure that sub-contractual providers of ChildNet are fulfilling the terms and conditions of their contract(s). The Quality Manager (QM) or designated staff specifically assigned to monitor the contract, individually or as a member of a team, serves as ChildNet's agent to perform the contract monitoring consistent with the methodologies as described in this policy and procedure. The information obtained through the contract monitoring process provides ChildNet with critical information upon which to make decisions regarding continuing relationships with service providers. The programmatic monitoring focuses on the quality of services provided to the clients.

Scope of Contract Monitoring

Contract monitoring conducted by the Service Quality Department can incorporate a wide scope of activities that include, but may not be limited to:

- Desk reviews – Documents may be requested from the provider to be reviewed at ChildNet. The CQI Department may opt to perform a desk review when the provider has a small number of clients served or if there is a specific area of concern that may be subject for review.
- Site visits – In collaboration with the ChildNet Contract Manager, site visits are conducted on-site at the provider agency. Visits may include an interview with the primary person responsible for managing the contracted program and a walk-through (as applicable). The scope of the visit is often limited to three (3) or four (4) areas for review.
- Full programmatic monitoring – These in-depth visits to the provider may extend more than one (1) day and often include a wide array of programmatic items to be reviewed. Interviews may include multiple staff members as well as clients served. Residential programs receive a walk-through tour.

The type of review conducted is made at the discretion of the Director of Service Quality and may be based on a provider's performance and compliance with the terms and conditions of the contract.

Assignment of Contract Monitor

The Director of Service Quality, or designee, determines whether the monitoring shall be performed by one (1) QM or a team of QMs. This determination is typically based on the scope of contract monitoring to be completed and staffing needs.



To help ensure that the monitors meet ChildNet's standards for independence and impartiality, a monitor must disclose any impairment to his or her independence and any situations that may be perceived as impairment. Potential impairments include any relationship (e.g., personal, family, or business) with key provider personnel or a business interest, direct or indirect, in the entity being monitored. In addition, if during the course of monitoring impairment should arise, the monitor shall inform the Director of Service Quality for further determination.

Monitors may not receive any gift from a provider that might present even an appearance of impropriety. They must conduct themselves in a professional manner which reflects favorably upon themselves and ChildNet. The monitors must adhere with all requirements of confidentiality as consistent with federal and state laws. If monitors become aware of a client health or safety concern while at a provider location or through some other aspect of their monitoring activity, they must follow the appropriate reporting procedure (i.e., informing the Department of Children and Families (DCF) Florida Abuse Hotline and Local Law Enforcement). If a concern surfaces in which another division of ChildNet should be notified, the Team Leader must make that notification.

Relationship between Contracts and Licensing Services staff and QA

For each provider, a Contract Manager is assigned by the Director of Contracts and has the ongoing responsibility for the provider's compliance with contractual obligations and in providing technical assistance. Whereas, the monitor(s) assigned to conduct contract monitoring by the Director of Service Quality, or designee, has a periodic relationship with a provider relative to the monitoring visit. The Contract Manager completes ongoing monitoring activities, including the review of:

- Financial Utilization – Monthly
- Review Cash Match as applicable – Monthly
- Verify Cost Reimbursements – Monthly
- Number of Clients Served – Monthly
- Incident Reports – Monthly
- Outcome Reports – Quarterly
- Ongoing Site Visits - Quarterly (or more frequently as needed)

ChildNet's Quality Specialists in the Licensing Unit are responsible for the initial and annual child caring licensing of all foster home license applications and annual renewals.

Co-Monitoring with Other Entities

The Director of Service Quality determines whether any co-monitoring with another entity will occur. Co-monitoring shall only occur if the needs of ChildNet can be fully met and if there are no contraindications to co-monitoring. Attempts to co-monitor may not impede the timeliness of ChildNet's contract monitoring processes. Sharing of information with other entities may occur if legally and otherwise appropriate and permissible.



Determining Which Contracts Will Be Monitored

Pre-determined selection criteria are used to standardize decision-making as to the contracts selected for programmatic monitoring. This process is based on a weighted Risk Assessment Tool. For the purpose of this procedure, the Risk Assessment Tool is an automated decision-making tool that provides a weighted ranking of High, Medium, or Low risk based on the following criteria:

- Contract Dollar Value
- Nature of Services
- Number of Clients Served
- Prior Provider Performance and Performance Improvement Plan
- New Provider or Significant Changes for Provider
- Last Monitoring Visit
- Accreditation
- Outcome Measure Performance

The Director of Service Quality, or designee, is responsible for making the contract monitoring selection and producing a prioritized list. This list is completed utilizing Outcome Report data for the purpose of determining which contracts shall be monitored from continuing contracts and entered into the Risk Assessment Tool. If circumstances change with regard to any contract, the priority for monitoring may be changed at any time. If a provider has one (1) high priority contract, there is a chance that all contracts will be considered high priority and monitored if time and staffing permit.

At a minimum, high-risk contracts should never go more than one (1) year without being monitored. Medium Risk contracts should be monitored every other year, while Low Risk contracts can be monitored every three (3) years. However, the final schedule will be at the discretion of the Director of Service Quality or designee. Additionally, the Director of Service Quality or designee may utilize a monitoring protocol to routinely conduct contract monitoring. Unless a need is identified, new contracts are not typically monitored during the first fiscal year. This does not preclude ChildNet's Contracts Department from conducting quarterly site visits.

The Director of Service Quality, or designee, develops a draft schedule for all providers to be monitored for the year and distributes it to the Directors of Contracts and Finance in order to assist with yearly planning.

The Service Quality Department monitors contracts which provide direct services to clients. Contracts for general services (e.g., telephones, computer maintenance) as well as contracts for legal or other services are excluded. Additionally, contracts with duration of six (6) months or less and/or a value of \$25,000 or less may be excluded from monitoring.



Quality Manager Pre-Monitoring Responsibilities

Once a QM is assigned the Team Leader role for a particular contract or contracts to monitor, there are certain pre-monitoring activities which may be performed. These activities may include, but are not limited to:

- Research all available materials with regard to the contract. Most of these materials will typically be found in the Contract Manager's file or submitted by the provider in advance of the monitoring visit.
- Facilitate a meeting (formal or informal) with the Contract Manager and Licensing Unit (as applicable) to strategize the upcoming monitoring to include a discussion of any questions or concerns as well as written changes to the contract and verbal agreements/pending amendments. In addition, the Contract Manager provides the Team Leader with the most recent quarterly outcome report and any other relevant information such as Independent Living or Foster Home Recruitment Plans. The Contract Manager and Licensing Unit should make the Team Leader aware of any licensing requirements, assurances, or certifications that were part of the contract award. If appropriate, the Team Leader includes specific areas of concern in the scope of monitoring.
- When conducting full programmatic monitoring, the provider is notified when the monitoring will take place via a 'save the date' email as soon as the monitoring schedule is complete. A formal notice is sent to the provider no less than thirty (30) calendar days prior to the monitoring date. For site visits or desk reviews, providers will receive notice of the monitoring date at least one (1) week prior.
- Prior to the programmatic monitoring, the Team Leader will email the provider with an official notification detailing information regarding the purpose of the monitoring, scope (i.e., areas that will be monitored/completed, such as file reviews, interviews, tours, observation of service delivery), and number of files to be reviewed. The provider is requested to assign a liaison to the Team Leader who will serve as the readily available contact person while the monitoring takes place. This liaison arranges workspace for the monitoring team (as applicable) and assures access to all needed records and staff. In addition, the liaison supplies the Team Leader with requested documents, as well as a list of clients served and personnel working under the contracted program in advance of the visit. For full programmatic monitoring, the provider will receive a schedule of the monitoring visit as well as a copy of all applicable monitoring tools.

Sampling Methods

If the scope of monitoring dictates a review of client and/or personnel files, a random sample is generated by the Team Leader and may be shared with the provider's liaison prior to the monitoring visit. As contract monitors are rarely able to review 100 percent of a provider's records, it is an accepted practice to draw a sample of records and draw a conclusion regarding the provider's compliance to a particular item.



A sample size calculator is utilized to select a random sample based on the statistical significance selected. This method may be used for providers with more than ten (10) clients serviced or more than ten (10) employees in the contracted program. Every effort is made to ensure a statistically valid sample is reviewed; however, minimally the first ten (10) files chosen by the random sample calculator is selected for review. The next five (5) files are selected as an over sample should any of the files in the original sample be deemed not appropriate or if a larger sample is necessary. If the provider has ten (10) or less clients served the monitor(s) attempts to review all of the client files. Similarly, if the provider has ten (10) or less staff dedicated to the contracted program, the monitor(s) attempts to review all personnel files.

In the event that a statistically valid sample is not able to be reviewed, the Team Leader will indicate this fact in the Monitoring/Site Visit report.

The Monitoring Visit

When conducting on-site monitoring, the Service Quality Team Leader initiates the monitoring with a brief entrance discussion which includes the purpose and scope of the visit as well as an opportunity for the provider to ask any questions. A tour is requested, as necessary.

As a part of the contract monitoring, the monitors may include any or all of the following methods, as applicable:

- File reviews
- Client interviews
- Employee interviews
- Stakeholder interviews. All respondents in each category (i.e., staff, client, etc.) are asked the same set of questions in order to assure comparability of responses and to reduce bias. (Electronic or telephonic interviews are acceptable)
- Validation of data previously submitted by provider including service validation
- Data collection
- Observation of service delivery
- Child Resource Records (CRRs)
- Other

The monitors may seek information to include the following, as applicable:

- Selected areas of compliance with general contract requirements,
- Provider is licensed to provide the contracted services,
- Target (eligible) population and target area (if specified) is being served,
- Services are being provided according to the date, time, location specified,
- Quality services are being provided which meet the intent of the contract,
- Client records are accurate and up-to-date,
- Staffing requirements are met, including qualifications,
- Data on performance measures is being collected, recorded, and stored in a manner which ensures validity,



- Documentation of a suitable, active CQI Program at the provider,
- Follow-up to incident reports,
- Client satisfaction activities,
- Review of problem areas from most recent monitoring, if any,
- That if any subcontractors are used, it is per the conditions allowed in their contract,
- Best practices are encouraged, acknowledged, shared,
- Most recent accreditation findings if any
- Reports from any other recent monitoring completed by other agencies, and
- Achievement of ChildNet deliverables and utilization goals.

The monitors review the providers' services both quantitatively and qualitatively. For example, quantitatively: Have the people they claim to have served really received the service? And, for example, qualitatively: Has the service yielded the desired outcome? A primary focus of contract monitoring is interviewing (as applicable), staff, clients, and other stakeholders of the services provided to determine the effectiveness of the contracted services provided.

The monitors record their observations electronically on tool(s) utilized for monitoring to evaluate the presence, clarity, quality, and continuity of contractually required documents and services. However, the Monitoring/Site Visit Report will consist of both a narrative and a completed contract monitoring tool (as applicable). Among other things, the written narrative will contain the monitor's assessment of the qualitative and quantitative aspects of the service provided.

When visiting a provider, the monitors are not to remove original provider records from the premises. Providers will make copies or electronically scan any of the documents, if needed. The monitors will exercise care to maintain materials in their possession, especially but not limited to, those of a confidential nature.

The monitors are responsible for verifying that the provider is delivering services according to their contract. The Service Quality Team is not responsible for reviewing the monthly payment requests or other similar documentation provided to the Contract Manager. The Service Quality Team does not perform the monitoring elements as listed in the Administrative/Financial Monitoring section of this document. This responsibility will be completed by ChildNet financial personnel or the Contract Manager on the visit or during the contract year.

Unofficial, general feedback regarding the monitoring is shared with the subcontractor during the course of the monitoring site visit. In addition, any client safety concerns are brought to the attention of the agency as soon as possible.

At the close of the monitoring visit, the monitors conduct an informal debriefing with available provider staff to discuss any items that have been tentatively rated as in non-compliance, with the understanding that the provider can still submit information to the Team Leader for re-consideration up until the time the monitoring report is finalized.

If during the course of the monitoring visit, the Service Quality Team encounters any serious or questionable findings (such as client records that appear to be altered or falsified), the



Team Leader will obtain a copy of the document(s). Upon the Team Leader's return from the site visit, the document(s) will be provided to the ChildNet Legal Department in order to obtain legal opinion.

Data Collection

Data integrity assures an accurate assessment of provider output and outcome compliance. It is important that ChildNet and its providers are in agreement and understand key terms and measures. The provider is mandated to have a system in place to collect the required data and report it timely to ChildNet. If, over time, the provider's staff changes, new staff must be properly trained to continue to provide consistent, uninterrupted data. As detailed in their contract with ChildNet, providers submit data in a standardized format to the Contract Manager. If data is late or missing, the provider must offer an explanation and remedy.

As stated previously, the Contract Manager provides the most recent quarterly outcome report to the Team Leader in advance of the monitoring. During the monitoring, the Service Quality Team might conduct activities to validate the data which has been submitted by the provider. The monitors first review data in terms of logic and common sense before applying any analysis or comparison. In addition, the monitors verify whether the contents and quantities of service reported match with actual client records. Further, they might conduct client interviews to confirm content, quantity, and quality of services.

Administrative/Financial Monitoring

ChildNet's Chief Financial Officer or designee will assign the appropriate staff to conduct the administrative and financial elements of monitoring. The Administrative/Financial Monitoring will be conducted at least annually for contracted providers and high-risk providers, which are determined through financial analysis and utilization or discussion with ChildNet's Contract Management Department. However, administrative monitoring may be limited to contracted providers with accreditation from the Council on Accreditation (COA), Commission on Accreditation of Rehabilitation Facilities (CARF), or The Joint Commission to every three (3) years except for determining that services paid for are being provided, investigating complaints or suspected problems, monitoring compliance with terms and conditions that are not of a general nature, and ensuring compliance with state and federal laws, regulations, and rules if doing so would not be duplicative of the accreditation agency's review in accord with accreditation standards.

The Administrative/Financial Monitoring will focus on two (2) main goals.

1. To determine if the provider is expending ChildNet funds for ChildNet programs.
2. To determine if the provider has sufficient human and financial resources to fulfill the terms of the contract.

The following are the basic monitoring responsibilities of the finance/administration representative conducting the Financial Review:



- Review quarterly financial statements/expenditure reports for the fiscal year being monitored for a sample of ChildNet funded programs including:
 - Comparison between the expenditures and the budget
- Review the provider's current Independent and/or Single Audit and management letter.

The Contract Manager will conduct a brief review of the financial statements submitted by the provider.

Post-Monitoring Activities

Shortly after the monitoring, the Team Leader ensures that a list of all items not found during the review is sent to the provider. The provider is permitted at least five (5) business days to submit the documentation/information to the Team Leader. Within twenty (20) business days of the end of the review, the Team Leader submits a draft report to the Director of Service Quality. If the monitoring on-site visit entailed three (3) or more contracted programs from a single provider, the deadline to submit the draft report may be extended by the Director of Service Quality for an additional five (5) business days to provide more time for the increased workload.

The Monitoring/Site Visit Report may include the following:

- Cover Page with provider name, date(s) of the review, contract(s) reviewed, Service Quality Department and date of draft and/or final report. This page or the following page lists Monitoring Team participants and the Director of Service Quality.
- Table of Contents
- Report Summary – which may include a summary of the overall compliance of each contract or area evaluated (as applicable), charts, a narrative regarding strengths, best practices, trends, and any significant findings, a synopsis of interviews, and recommendations.
- Appendices
 - Appendix I: Methodology used to review the contract including the tools used and the sample selected for review.
 - Appendix II: The Performance Improvement Plan shell table (if applicable).
- Attachments
 - Tools used for monitoring

The Director of Service Quality reviews the draft report and monitoring tool with the Team Leader. If warranted, the Director of Service Quality and/or Team Leader discusses aspects of the monitoring results with other ChildNet staff. Once the initial review of the draft is completed and the Team Leader is provided with guidance as to any necessary changes, the



Team Leader completes the draft report. The draft report must be routed through and approved by the Director of Service Quality or designee. A copy of the draft report is sent to the Director of Contracts and Contract Manager to provide them with preliminary results of the monitoring.

The provider receives the draft report from the Team Leader within thirty (30) business days after the end of the review. Upon the completion of the draft monitoring report, an Exit Review Meeting may be scheduled with the provider if warranted. The Exit Review may be waived at the request of the provider if no further changes to the report are requested. Generally, those who attend the Exit Review Meeting are the same individuals who attended the Entrance Interview and/or have been key participants in the monitoring. However, attendance may vary. The draft report is reviewed during the formal exit meeting. The provider is given the opportunity to produce any documentation that the reviewers may have missed or not been provided with during the review.

Agreed upon changes are made to the draft report, and a Final Report is issued to the provider. If the provider waives participating in an Exit Review Meeting, the report is immediately finalized. The Final Report is sent electronically upon its completion. Transcripts of interviews with staff, clients, and stakeholders are not provided in order to protect the confidentiality of interview participants. Copies are provided to ChildNet's applicable departments, including the Director of Contracts and to ChildNet's DCF Contract Manager upon his or her request.

Substantial problems are discussed with the Service Quality Team and the Director of Service Quality to ensure consistency with any recommended action by the provider. The Director of Contracts may be included depending on the severity of the issues uncovered during the monitoring. If improvement is needed, the provider must complete a Performance Improvement Plan (PIP) within thirty (30) calendar days of the Exit Review meeting or issuance of the final report if the provider waived the meeting. The Plan must be submitted to the designated Contract Manager and Team Leader in the format provided, or as selected by the provider, and approved by the Contract Manager. Each item must have a time frame for completion. If an item requiring improvement is of such a nature that it cannot wait thirty (30) days to rectify, the Contract Manager indicates this to the provider and a separate, more immediate Plan or solution to that issue is required.

Once the provider submits the PIP, the Contract Manager and Team Leader reviews it to assure that all necessary items have been addressed and that the proposed solution is acceptable within the stated timeframe. The provider is notified within ten (10) business days of receipt of the Plan whether the Plan is approved. If not approved, every effort must be made to develop an acceptable PIP within the thirty (30) day period. The Team Leader schedules follow-up to determine compliance and remediation monitored at 60, 90, and 120 intervals following finalization of PIP unless otherwise stated. In the event that the Plan is not received by the provider within thirty (30) days from the Exit Review Meeting, the Contract Manager contacts the provider in writing requesting the Plan be submitted within five (5) business days.



If there is disagreement between the Monitoring Team and provider regarding the monitoring report or necessary corrective action, the Director of Service Quality may become involved. If a difference of opinion continues, the Dispute Resolution procedure as outlined in the core contract with each contracted provider may be invoked.

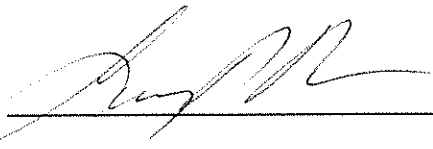
Unscheduled Site Visits

The QM or Contract Manager may conduct unscheduled sites visits to the provider at his or her discretion.

Contract Monitoring Documentation and File

The Team Leader maintains monitoring process documentation of his/her monitoring activities. An electronic file is created each contract year which includes, as applicable: the monitoring letters, tools, report, and, if applicable, PIP.

Should any copies of these files be requested, client confidentiality is treated with utmost regard, i.e., names/identifying information redacted from materials before release.

President's Signature:  **Date:** 09-20-22