



## **RISK-BASED PROVIDER MONITORING PLAN MAY 2009**

Mid-South shall monitor the performance of its contracted substance use disorder treatment and prevention providers and their compliance with published standards. All providers are monitored using all available data and information. Contractors are assessed for risk level using the criteria specified in this protocol. Monitoring activity will be commensurate with the degree of risk assessed.

It should be noted and well understood that a single event can occur that would cause Mid-South to change the assessed risk level of a particular provider. Examples include the occurrence of a sentinel event, a serious substantiated recipient rights complaint, patterns of or significant single occurrences of any kind. Mid-South reserves the right, at its sole discretion; to act on any/all information it receives in a prudent and responsible manner and to escalate (or de-escalate) at any time a provider's risk assessment.

### **MINIMUM MONITORING ACTIVITIES – ALL PROVIDERS**

- 1) Mid-South personnel shall document routine ongoing contracts with providers regarding program activities, and will ensure that the work completed met the program's objectives. Documentation will be formal where concerns are identified.
- 2) Mid-South will collect, analyze, and use all available data to assess provider risk.
- 3) All contracted providers are subject to an on-site review by Mid-South personnel to document the degree to which the contractor is in compliance with published performance standards at least every two years. This review may be limited in scope dependent on review of data and report submissions. The site review will be documented on approved forms and findings communicated to providers. Corrective action requirements will be detailed in this communication. The reports will be presented to the Program Development Committee and made available to the public upon request.
- 4) For providers funded on an other than fee-for-service basis, Mid-South personnel will review financial status reports (FSRs) submitted to determine the following (with a signature evidencing review):
  - a. Timeliness and accuracy;
  - b. Budgetary compliance;

- c. Unusual items to be further evaluated (i.e., charging exactly the budgeted amount, pace of expenditures, etc.);
  - d. Financial requirements being met (i.e., matching, limitations on administrative cost, etc.);
  - e. Proper certifications
- 5) If warranted, Mid-South personnel will request and review detail (i.e., expenditure reports, general ledger detail, vendor invoices, purchase orders, etc.) to explain any questionable items from the FSR review.
  - 6) Mid-South will provide written feedback to providers for the purpose of letting them know where a problem exists and, if applicable, requiring corrective action.
  - 7) Mid-South staff will provide follow-up to ensure corrective action is taken on all deficiencies noted in any area above.

### **EXPANDED MONITORING ACTIVITIES – LOW RISK PROVIDERS**

Mid-South will assess the risk associated with a particular provider according to the criteria established in the risk assessment rubric. A finding of low risk will be made if most of the criterion for this finding is in evidence. To be assessed at this level of risk, a provider may not have any high risk characteristics and may display only two moderate risk criteria.

- 1) Providers who are assessed as low risk shall be subject only to the minimum monitoring specified above.
- 2) Providers who are assessed as low risk may have special monitoring arrangements for the dimensions that are not assessed as other than low risk.

### **EXPANDED MONITORING ACTIVITIES – MODERATE RISK PROVIDERS**

Mid-South will assess the risk associated with a particular provider according to the criteria established in the risk assessment rubric. A finding of moderate risk will be made if most of the criterion for this finding is in evidence. To be assessed at this level of risk, a provider may have one high risk characteristic and may display several low risk criteria.

- 1) Providers who are assessed as moderate risk shall be subject to an annual (or more frequent) on-site review. This review may be a limited review of specific criteria.
- 2) Providers who are assessed as moderate risk may have special monitoring arrangements for the dimensions that are assessed as high risk.
- 3) Providers who are assessed as moderate risk may be required to submit additional documentation or reports to demonstrate compliance or improvement in specially identified areas.

## **EXPANDED MONITORING ACTIVITIES - HIGH RISK PROVIDERS**

Mid-South will assess the risk associated with a particular provider according to the criteria established in the risk assessment rubric. A finding of high risk will be made if most of the criterion for this finding is in evidence. To be assessed at this level or risk, a provider may have several areas of low or moderate risk in addition to many high risk characteristics.

- 1) Providers who are assessed as high risk shall be subject to twice-annual on-site reviews, one of which is a complete review and the other of which is focused on the high risk areas. The reviews can be implemented at a greater on-site frequency, depending on the circumstances and risk perceived.
- 2) Providers who are assessed as high risk may have additional special monitoring arrangements for the dimensions that are assessed as high risk.
- 3) Providers who are assessed as high risk may be required to submit additional documentation or reports to demonstrate compliance or improvement in specially identified areas.