

## **Attachment 1**

# **Managing Entity Contract Monitoring Reports**



## 2014-2015 Contract Oversight Report of Core Scope Monitoring Results

State of Florida  
Department of  
Children and Families

Diane Dusenbury, MBA, MEd  
Chief of Contract Oversight

North Florida Contract Oversight Unit  
Report 1415-2610-ME  
May 8, 2015

### Big Bend Community Based Care, Inc. Contract AHME1

The Department of Children and Families (DCF) Contract Oversight Unit (COU) monitored Big Bend Community Based Care, Inc. for compliance with some contractual requirements. The scope was limited to topics identified as core topics, to be monitored for all contracts, and to any topics identified as core by relevant programs. Contract managers were also invited to add topics to the monitoring scope. Topics were limited or removed from scope if the monitoring would duplicate the information from other independent review entities already in the contract manager's file.

The provider declined to have an exit conference on April 30, 2015. For the purpose of issuing the report, this date was considered the completion of the monitoring.

This report is produced using a snapshot perspective of contract compliance at a point in time. For complete information on the provider's compliance with contract terms and conditions, please contact the contract manager.

The purpose of this report is to provide information to the contract manager and to programs about provider noncompliance with the contract, as required by section 402.7305, Florida Statutes (F.S.) and by Children and Families Operating Procedure (CFOP) 75-8.

In addition to Contract AHME1, Big Bend Community Based Care holds Contract BJ101. These contracts were monitored as part of a single monitoring engagement. Separate reports are being produced for each contract.

Contract AHME1, Attachment I, A.2.a. states:

*The Department is contracting with Big Bend Community Based Care, Inc., as a Managing Entity, to develop, implement, administer, and monitor a behavioral health Safety Net for persons receiving uncompensated care, pursuant to state and federal law, within the annual appropriation.*

## **2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results**

The following abbreviations are used in this report.

ALF = Assisted Living Facility

CAP = Corrective Action Plan

TANF = Temporary Assistance to Needy Families

HIPAA = Health Insurance Portability and Accountability Act

HIV = Human Immunodeficiency Virus

IRAS = Incident Reporting and Analysis System

PATH = Projects for Assistance in Transition from Homelessness

SAMHIS = Substance Abuse and Mental Health Information System

SAMHSA = Substance Abuse and Mental Health Services Administration

SAPTBG = Substance Abuse Prevention and Treatment Block Grant

# 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

## Findings

### SAPTBG Requirements

Contract Reference(s): Contract AHME1, Attachment I, Exhibit A

Monitoring Method: Review of the provider's policies and procedures, monitoring reports, and monitoring tools for network providers' compliance with contract requirements.

Review of the provider's tracking of network providers' annual units for HIV and women's services, the budget for women's services, and data tracking measures for a distinction in SAMHIS between block grant and non-block grant funded services for CAP requirements.

Area of Noncompliance	Required by...
The provider has not developed standardized monitoring tools.	Contract AHME1, Attachment I, Exhibit A, 3.2b.
The ME does not ensure that the network providers serving injection drug users implement the 14/120 day requirement found in federal regulations and provide interim services until such time as the clinically appropriate level of treatment can be provided to the individual.	Contract AHME1, Attachment I, Exhibit A, 2.5

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### Incident Reporting

Contract Reference(s): Contract AHME1, Standard Contract, 11.

Monitoring Method: Review of the provider's policies and procedures and 21 critical incidents out of 62 total incidents entered in IRAS from November 2014 through January 2015.

Area of Noncompliance	Required by...
All 21 critical incidents did not have documentation of having review or follow-up according to the provider's policy and procedure.	CFOP 215-6, 6.c.(6)
2 of 21 critical incidents were reported into IRAS 1 day late.	CFOP 215-6, 6.a.(4)

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### No Findings Identified

Findings were not identified in the following areas of scope.

Topic or Area of Review	Method and Scope
Network management	<p>Review of the policies and procedures and supporting documentation for implementation of the risk assessment, on-site monitoring, and CAP actions.</p> <p>Review of the annual schedule, the on-site programmatic tools, and the fiscal monitoring tools.</p> <p>Review of 7 of 7 network providers' on-site monitoring files for implementation of the monitoring process as described in policies and procedures and use of the developed monitoring tools.</p> <p>Review of provider tools and reports for monitoring of background screening at network providers.</p> <p>Review of provider data collection, reporting, and analysis process and the supporting data system reports for contractual requirements.</p>
TANF monitoring requirements	<p>Review of the provider's TANF monitoring tool for required elements.</p> <p>Review of the monitoring conducted of 2 of 2 TANF providers for required monitoring elements.</p> <p>Review of the documentation of the provider conducting training of network providers on TANF requirements.</p>
ALF case management monitoring	<p>Review of the provider's ALF monitoring tool for required elements.</p> <p>Review of the 1 ALF case management monitoring conducted by the provider for the required monitoring elements.</p> <p>Review of the DCF CAP requirements.</p>
State mental health discharge plan	<p>Review of the state mental health discharge plan and implementation of the activities as described in the plan and interview with the provider.</p>

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### No Findings Identified (Continued)

Findings were not identified in the following areas of scope.

Topic or Area of Review	Method and Scope
SAMHSA grantee financial management requirements	Review of the provider's financial management policies and procedure for implementation of the DCF CAP requirements.
PATH grant	Review of provider tracking of network providers' match funds and budget for implementation of the DCF CAP requirements.
Implementation of administrative plans and DCF CAP requirements	Review of the network management plan, continuous quality improvement plan, data collection reporting and analysis plan, and the fraud abuse and prevention plan for implementation of the detailed activities and of the DCF CAP requirements.
Subcontracts	Review of 5 of 30 electronic network provider files for inclusion of required contract language and all documents.  Review of 30 invoices for 10 subcontractors for July 2014 through September 2014 for timeliness of payment.
HIPAA	Review of the provider and the data management subcontractor policies and procedures for data security.  Review of the provider policies and procedures for client privacy.
Staffing requirements	Review of staff staffing requirements through an interview with the provider.
Employment eligibility verification	Review of all 4 newly hired employee record for completion of the I-9 form and E-Verify requirements, review of provider's E-Verify policies and procedures, and observation of posted notices.

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### Core Topics Excluded from Scope

Certain topics were excluded from the scope of review. Details are provided here.

Topic or Area of Review	Additional Information
Information security, confidentiality, mandatory reporting to the DCF Inspector General, and Whistleblower's Act	These topics were monitored in fiscal year 2013-2014 by Contract Oversight for the child welfare contract, substance abuse and mental health contract, or both. Monitoring of certain administrative requirements is limited to once every three years by 402.7306, F.S. as the provider is accredited by the Council on Accreditation.

This contract oversight monitoring was conducted in accordance with CFOP 75-8. It was led by Nichelle Jackson. The team members were Charles Brazil, Zenaida Panajon, and Fred Carey.

Please contact Fred Carey, North Florida COU Manager, at (904) 485-9712 with any inquiries regarding this monitoring.





## 2014-2015 Contract Oversight Report of Core Scope Monitoring Results

State of Florida  
Department of  
Children and Families

Diane Dusenbury, MBA, MEd  
Chief of Contract Oversight

South Florida Contract Oversight Unit  
Report 1415-2680  
March 2, 2015

### Broward Behavioral Health Coalition, Inc. Contract JH343

The Department of Children and Families (DCF) Contract Oversight Unit (COU) monitored Broward Behavioral Health Coalition, Inc., for compliance with some contractual requirements. The scope was limited to topics identified as core topics, to be monitored for all contracts, and to any topics identified as core by relevant programs. Contract managers were also invited to add topics to the monitoring scope. Topics were limited or removed from scope if the monitoring would duplicate the information from other independent review entities already in the contract manager's file.

The provider declined to have an exit conference on February 25, 2015. For the purpose of issuing the report, this date was considered the completion of the monitoring.

This report is produced using a snapshot perspective of contract compliance at a point in time. For complete information on the provider's compliance with contract terms and conditions, please contact the contract manager.

The purpose of this report is to provide information to the contract manager and to programs about provider noncompliance with the contract, as required by section 402.7305, Florida Statutes (F.S.) and by Children and Families Operating Procedure (CFOP) 75-8.

Contract JH343, Attachment I, A.2.a. states:

- (1) *The Department is contracting with Broward Behavioral Health Coalition, Inc., as a Managing Entity, to develop, implement, administer, and monitor a behavioral health Safety Net for persons receiving uncompensated care, pursuant to state and federal law, within the annual appropriation...*
- (2) *The Department is contracting with the Managing Entity to subcontract with qualified Network Service Providers, to provide publicly funded Behavioral Health Services pursuant to s.394.9082, F.S., that are located within the following county(ies):Broward.*

## **2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results**

The following abbreviations are used in this report.

ALF = Assisted Living Facilities

BBHC = Broward Behavioral Health Coalition

CAR = Contract Accountability Review

CFR = Code of Federal Regulations

F.A.C. = Florida Administrative Code

HIPAA = Health Insurance Portability and Accountability Act

LMH = Limited Mental Health

SAPTBG = Substance Abuse Prevention and Treatment Block Grant

SOAR = SSI/SSDI Outreach, Access, and Recovery

TANF = Temporary Assistance to Needy Families

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### Findings

#### Subcontractor Performance Monitoring and Accountability

Contract Reference(s): Contract JH343, Attachment I, B.1.a.(4)

Monitoring Method: Review of 8 network providers with 10 subcontracts for monitoring support documentation from a total of 22 monitored from January through December 2014, review of BBHC's network service provider management plan, review of the annual monitoring schedule, and interview with provider.

Area of Noncompliance	Required by...
1 of 8 network service providers was not issued a final monitoring report within 30 calendar days from the date of the site visit exit interview.	BBHC PR001, Contract Accountability Reviews, Part II
<p>BBHC did not use customized tools based on the terms or conditions of the contract for the following areas monitored.</p> <ul style="list-style-type: none"> <li>• Level 2 background screening.</li> <li>• Staffing requirements.</li> <li>• Employment eligibility verification.</li> <li>• Data security.</li> <li>• Incident reporting.</li> <li>• Whistleblower's Act.</li> <li>• Client confidentiality.</li> </ul>	<p>JH343, Attachment I, B.1.a.(4)</p> <p>CFOP 75-8, 2-6.d.</p> <p>BBHC Policy and Procedures PR001.CAR #14.01.</p>
9 of 10 subcontracts monitored for core review elements did not have documented authorization in writing by the Director of Provider Relations approving the omission, but had some core elements omitted from scope.	BBHC Policy and Procedures PR001.CAR #14.01.
3 of 10 subcontracts were not monitored for service validation.	Contract JH343, Attachment I, B.1.a.(4)(b)ii.

**2014-2015 DCF Contract Oversight  
Report of Core Scope Monitoring Results**

**Subcontractor Performance Monitoring and Accountability  
(Continued)**

**Area of Concern**

BBHC had performed monthly invoice analyses and other contract management activities, but had not conducted desk reviews for providers that did not have an onsite monitoring during the 2013-2014 fiscal year.

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### Fraud and Abuse Prevention

Contract Reference(s): Contract JH343, Attachment I, B.1.a.(3)(d)

Monitoring Method: Review of BBHC Fraud, Abuse and Waste Prevention Plan and all 3 reported cases identified on BBHC's fraud and abuse log for 2014 and interview with provider.

Area of Noncompliance	Required by...
1 of 3 fraud and abuse cases reported to the Office of the Inspector General was reported 1 day late.	BBHC Fraud, Abuse and Waste Prevention Plan, III.
BBHC did not provide documentation to support all network providers conducted fraud, abuse and waste training for their staff.	BBHC Fraud, Abuse and Waste Prevention Plan, IV.B.

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### Assisted Living Facilities Case Management Monitoring

Contract Reference(s): Contract JH343, Attachment I, B.1.a.(4)(b)g.

Monitoring Method: Review of all 3 ALF subcontracts and support documentation that were monitored from January through December 2014, review of BBHC's annual monitoring schedule, and interview with provider.

Area of Noncompliance	Required by...
BBHC did not provide documentation to show that it included at least 20 percent of all LMH-ALF clients in its monitoring samples.	Incorporated Document 8

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### Substance Abuse Prevention and Treatment Block Grant Requirements

Contract Reference(s): Contract JH343, Attachment I, Exhibit A

Monitoring Method: Review of 2 SAPTBG set aside subcontracts with support documentation from a total of 4 monitored subcontracts from January through December 2014, review of policies and procedures, review of annual monitoring schedule, and interview with provider.

#### Area of Concern

At the time of the COU monitoring, BBHC had not conducted programmatic monitoring of any of its SAPTBG subcontractors.

# 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

## Incident Reporting

Contract Reference(s): Contract JH343, Standard Contract, 12.

Monitoring Method: Review of BBHC policy and procedures, review of 21 critical incidents out of 240 incidents reported in the provider's internal incidents reporting system from April through December 2014, and interview with provider.

Area of Noncompliance	Required by...
<p>Of 21 critical incidents reviewed:</p> <ul style="list-style-type: none"><li>• 1 incident did not include notification to the client's parent, guardian, representative or relative.</li><li>• 4 incidents reported by network providers were not entered into IRAS timely.<sup>1</sup></li></ul>	<p>CFOP 215-6, 6.a.(3) and a.(4)</p>

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<sup>1</sup> 2 were entered 1 day late.  
1 was entered 3 days late.  
1 was entered 34 days late.



## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### No Findings Identified

Findings were not identified in the following areas of scope.

Topic or Area of Review	Method and Scope
Reintegration	Review of the Reintegration Plan and community planning and collaborative activities, with support documentation including meeting agendas and minutes, and interview with provider.
TANF	Review of 2 TANF services subcontracts from a total of 4 TANF subcontracts that were monitored by the provider in 2014 for client eligibility, outreach services, client treatment plan, progress notes, and child welfare services.
SOAR requirements	Review of the Managing Entity SOAR Action Plan, quarterly meeting agendas and minutes, collaboration with the State Team Lead and the Social Security Administration, training of network providers, and registration with Online Application Tracking.
Corrective action review	Review of 10 subcontracts with corrective action plans from a total of 15 subcontracts monitored from January through December 2014, review of provider's policies and procedures, and interview with provider.
Staffing requirements	Review of provider organizational chart, staff job descriptions, and duties and assignments and interview with provider.
Data submission requirements	Review of policies and procedures, review of data tracking process for timeliness and accuracy, and interview with provider.
Information security	Review of all 3 personnel records of staff with access to Department information for the latest Department security awareness training and signed DCF security agreement form, review of policy and procedures and encryption requirements, and interview with provider.

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### No Findings Identified (Continued)

Findings were not identified in the following areas of scope.

Topic or Area of Review	Method and Scope
Employment eligibility verification	Review of the only newly hired employee record for completion of the I-9 form and E-Verify requirements, review of provider's E-Verify policies and procedures, observation of posted notices, and interview with provider.
Administrative requirements	Review of provider policies and procedures for HIPAA, abuse reporting, whistleblower's act, and client confidentiality and interview with provider.

### Core Topics Excluded from Scope

Certain topics were excluded from the scope of review. Details are provided here.

Topic or Area of Review	Additional Information
Mandatory reporting	This is not a contractual requirement.
Background screening for Managing Entity personnel	This is not a contractual requirement.

This contract oversight monitoring was conducted in accordance with CFOP 75-8. It was led by Brian Browne. The team members were Fred Victor, Benjamin Nwigwe, Diane Dusenbury, and Christopher Meadows.

Please contact Fred Victor, South Florida COU Manager, at (786) 257-5078 with any inquiries regarding this monitoring.



## 2014-2015 Contract Oversight Report of Core Scope Monitoring Results

State of Florida  
Department of  
Children and Families

Diane Dusenbury, MBA, MEd  
Chief of Contract Oversight

Mid Florida Contract Oversight Unit  
Report 1415-2645  
April 3, 2015

### Central Florida Behavioral Health Network, Inc. Contract QD1A9

The Department of Children and Families (DCF) Contract Oversight Unit (COU) monitored Central Florida Behavioral Health Network, Inc. for compliance with some contractual requirements. The scope was limited to topics identified as core topics, to be monitored for all contracts, and to any topics identified as core by relevant programs. Contract managers were also invited to add topics to the monitoring scope. Topics were limited or removed from scope if the monitoring would duplicate the information from other independent review entities already in the contract manager's file.

The provider declined to have an exit conference on March 27, 2015. For the purpose of issuing the report, this date was considered the completion of the monitoring.

This report is produced using a snapshot perspective of contract compliance at a point in time. For complete information on the provider's compliance with contract terms and conditions, please contact the contract manager.

The purpose of this report is to provide information to the contract manager and to programs about provider noncompliance with the contract, as required by section 402.7305, Florida Statutes (F.S.) and by Children and Families Operating Procedure (CFOP) 75-8.

Contract QD1A9, Attachment I, A.2.a.(1) states:

*The Department is contracting with Central Florida Behavioral Health Network, Inc., as a managing entity, to develop, implement, administer, and monitor a behavioral health safety net for persons receiving uncompensated care, pursuant to state and federal law, within the annual appropriation.*

The following abbreviations are used in this report.

HIPAA = Health Insurance Portability and Accountability Act

ME = Managing Entity

SAPTBG = Substance Abuse Prevention and Treatment Block Grant

TANF = Temporary Assistance to Needy Families

*Promoting Accountability for Service Delivery*

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### No Findings Identified

Findings were not identified in the following areas of scope.

Topic or Area of Review	Method and Scope
Network management plan	Review of the ME network management plan for required contractual elements and review of procedures for and implementation of monitoring and accountability, corrective action plans, fraud and abuse, and data submission and interviews with provider.
Fraud and abuse prevention plan	Review of the fraud and abuse prevention plan for contractually required elements and implementation of the plan and interview with provider.
Subcontracting	Review of 18 of 75 subcontracts for required language and supporting documentation and timely payment of invoices to subcontracted providers.
Substance Abuse Prevention and Treatment Block Grant	Review of documentation related to the administration of the SAPTBG funds for pregnant women including policies and procedures, waiting list, and monitoring activities and interview with provider.
Assisted living facilities case management monitoring	Review of monitoring tools and work papers for all 8 network providers monitored for case management requirements at assisted living facilities and interview with provider.
State mental health discharge plan	Review of the activities associated with the discharge of clients from the state mental health institutions and the utilization, tracking, and maintenance of the forensic incidental expense funds and interview with provider.
TANF requirements	Review of the documentation related to the administration of the TANF program requirements including invoicing, monitoring, and training, and interview with provider.
HIPAA privacy	Review of privacy requirements and policies and interview with provider.

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### No Findings Identified

Findings were not identified in the following areas of scope.

Topic or Area of Review	Method and Scope
Background screening	Review of the results of level 2 background screening for 5 employees hired since the COU monitoring in 2014 and 4 employees due for 5-year re-screening.
Employment eligibility verification	Review of I-9 forms for all 5 employees hired since the COU monitoring in 2014, review of E-Verify requirements, observation of posted notices, and interviews with provider.
Abuse reporting	Review of policies regarding abuse reporting.

### Core Topics Excluded from Scope

Certain topics were excluded from the scope of review. Details are provided here.

Topic or Area of Review	Additional Information
Mandatory reporting	This is not required by the contract.
Whistleblower's Act, confidentiality, incident reporting, and information security	These topics were monitored by Contract Oversight in fiscal year 2012-2013. Monitoring of certain administrative requirements is limited to once every three years by 402.7306, F.S., when the provider is accredited by Commission on Accreditation of Rehabilitation Facilities.
Staffing requirements	There were no executive level or key personnel changes made since the prior COU monitoring.

This contract oversight monitoring was conducted in accordance with CFOP 75-8. It was led by Carlos Nieves. The team members were Jose Mercado and Sandra Pruette.

Please contact Sandra Pruette, Mid Florida COU Manager, at (407) 317-7312, with any inquiries regarding this monitoring..



## 2014-2015 Contract Oversight Report of Core Scope Monitoring Results

State of Florida  
Department of  
Children and Families

Diane Dusenbury, MBA, MEd  
Chief of Contract Oversight

Mid Florida Contract Oversight Unit  
Report 1415-2657  
July 10, 2015

### Central Florida Cares Health Systems, Inc. Contract GHME1

The Department of Children and Families (DCF) Contract Oversight Unit (COU) monitored Central Florida Cares Health Systems, Inc. for compliance with some contractual requirements. The scope was limited to topics identified as core topics, to be monitored for all contracts, and to any topics identified as core by relevant programs. Contract managers were also invited to add topics to the monitoring scope. Topics were limited or removed from scope if the monitoring would duplicate the information from other independent review entities already in the contract manager's file. The preliminary results were discussed at the exit conference on June 11, 2015.

This report is produced using a snapshot perspective of contract compliance at a point in time. For complete information on the provider's compliance with contract terms and conditions, please contact the contract manager.

The purpose of this report is to provide information to the contract manager and to programs about provider noncompliance with the contract, as required by section 402.7305, Florida Statutes (F.S.) and by Children and Families Operating Procedure (CFOP) 75-8.

Contract GHME1, Attachment I, A.2.a. states:

*The Department is contracting with Central Florida Cares Health System, Inc, as a Managing Entity, to develop, implement, administer, and monitor a behavioral health Safety Net for persons receiving uncompensated care, pursuant to state and federal law, within the annual appropriation.*

The following abbreviations are used in this report.

CFCHS = Central Florida Cares Health System

ME = Managing Entity

*Promoting Accountability for Service Delivery*

# 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

## Findings

### Network Management Plan

Contract Reference(s): Contract GHME1, Attachment I, B.1.a.(4)(a)

Monitoring Method: Review of the ME Network Management Plan for required contractual elements, monitoring and accountability procedures, corrective action plan procedures, procedures for reporting and detection of fraud and abuse, data submission requirements, and interviews with provider.

Area of Noncompliance	Required by...
The ME monitoring schedule did not distinguish between on-site monitoring and desk reviews.	Contract GHME1, Attachment I, B.1.a.(4)(a)3.
The ME has not submitted on-site monitoring reports to the 8 network providers that had been monitored on-site during the 2014-2015 fiscal year.	CFCHS Network Management Plan, On-site Monitoring, Page 8, 5.

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### No Findings Identified

Findings were not identified in the following areas of scope.

Topic or Area of Review	Method and Scope
Fraud and abuse prevention plan	Review of the provider's fraud, waste, and abuse plan and associated documents and interview with provider.
State mental health discharge plan	Review of the activities associated with the discharge of clients from the state mental health institutions and interview with provider.
Substance abuse prevention and treatment block grant	Review of the policies and procedures associated with the block grant, inventory of network providers, monitoring tools and tracking systems and interview with provider.
Assisted living facilities case management monitoring	Review of monitoring tools and work papers for the network provider monitored for case management at assisted living facilities.
Health Insurance Portability and Accountability Act privacy rule	Review of policies and procedures, the notice of privacy form, and interview with provider.
Information security	Review of records of 13 of 22 employees for documentation of the latest Departmental security awareness training, signed security agreement forms, and interview with provider.
Subcontract language	Review of 15 of 47 subcontracts for required language and interview with provider.
Incident reporting	Review of incident reporting policy and procedure, review of 10 of 96 reportable incidents from July 2014 through March 2015, and interview with provider.
Background screening	Review of the results of level 2 background screening for 4 employees hired January through March 2015.
Staffing requirements	Review of staffing plan and interview with provider.



## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### No Findings Identified (Continued)

Findings were not identified in the following areas of scope.

Topic or Area of Review	Method and Scope
Employment eligibility verification	Review of I-9 forms for 4 employees hired January through March 2015, review of E-Verify requirements, and observation of posted notices.
Administrative policies	Review of policies and procedures for abuse reporting, confidentiality of client information, and the Whistleblower's Act.

### Core Topics Excluded from Scope

Certain topics were excluded from the scope of review. Details are provided here.

Topic or Area of Review	Additional Information
Mandatory reporting to the DCF Inspector General	This is not a requirement of the contract.

This contract oversight monitoring was conducted in accordance with CFOP 75-8. It was led by Jose R. Mercado. The team members were Cheryl Walls and Carlos Nieves.

Please contact Sandra Pruette, Mid Florida COU Manager, at (407) 317-7312, with any inquiries regarding this monitoring.



## 2014-2015 Contract Oversight Report of Core Scope Monitoring Results

State of Florida  
Department of  
Children and Families

Diane Dusenbury, MBA, MEd  
Chief of Contract Oversight

North Florida Contract Oversight Unit  
Report 1415-2614  
May 26, 2015

### Lutheran Services Florida, Inc. Contract EH003

The Department of Children and Families (DCF) Contract Oversight Unit (COU) monitored Lutheran Services Florida, Inc., for compliance with some contractual requirements. The scope was limited to topics identified as core topics, to be monitored for all contracts, and to any topics identified as core by relevant programs. Contract managers were also invited to add topics to the monitoring scope. Topics were limited or removed from scope if the monitoring would duplicate the information from other independent review entities already in the contract manager's file.

The provider declined to have an exit conference on May 19, 2015. For the purpose of issuing the report, this date was considered the completion of the monitoring.

This report is produced using a snapshot perspective of contract compliance at a point in time. For complete information on the provider's compliance with contract terms and conditions, please contact the contract manager.

The purpose of this report is to provide information to the contract manager and to programs about provider noncompliance with the contract, as required by section 402.7305, Florida Statutes (F.S.) and by Children and Families Operating Procedure (CFOP) 75-8.

Contract EH003, Attachment I, A.2.a., states:

*The Department is contracting with Lutheran Services Florida, Inc., as a Managing Entity, to the develop, implement, administer and monitor a behavioral health Safety Net for persons receiving uncompensated care, pursuant to state and federal law, within the annual appropriation.*

## **2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results**

The following abbreviations are used in this report.

ALF = Assisted Living Facilities

CAP = Corrective Action Plan

CFR = Code of Federal Regulations

EPA = Environmental Protection Agency

HIPAA = Health Insurance Portability and Accountability Act

HIV = Human Immunodeficiency Virus

ME = Managing Entity

SAMHIS = Substance Abuse Mental Health Information System

SAPTBG = Substance Abuse Prevention and Treatment Block Grant

TANF = Temporary Assistance to Needy Families

U.S.C. = United States Code

# 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

## Findings

### Subcontracts

Contract Reference(s): Contract EH003, Standard Contract, 8.

Monitoring Method: Review of 10 of 37 subcontracts for required language and 30 of 111 subcontractor invoices from January 2015 through March 2015 for invoice approvals and timely payment to network providers, and interview with provider.

Area of Noncompliance	Required by...
<p>1 of 10 subcontracts reviewed did not include the following requirements:</p> <ul style="list-style-type: none"> <li>• That the employees of the subcontractor who have access to Department information shall complete the latest Department security awareness training.</li> <li>• That the subcontractor will make every effort to protect and avoid unauthorized release of any personal or confidential information by ensuring both data and storage devices are encrypted as prescribed in CFOP 50-2.</li> <li>• That the subcontractor notify the managing entity following the determination of any breach or potential breach of personal and confidential Departmental data, so that the managing entity may notify the Department in turn within the required 5 working day timeframe.</li> <li>• That the subcontractor, at its own cost, shall provide notice to the affected parties no later than 45 days following the determination of any breach or potential breach of personal or confidential Departmental data as provided in section 817.5681, F.S.</li> <li>• That the subcontractor prohibits the employment of unauthorized aliens.</li> </ul> <p><i><b>This finding statement continues on the next page.</b></i></p>	<p>Contract EH003, 8.a., 8.b., 18., 28.b., 28.d., 28.e., 28.f., 35.a.ii., 35.a.iii., 35.a.iv., 35.a.vi., and 35.f.</p>

**2014-2015 DCF Contract Oversight  
Report of Core Scope Monitoring Results**

**Subcontracts (Continued)**

Area of Noncompliance	Required by...
<p><i>This finding statement continues from the prior page.</i></p> <p>1 of the 10 subcontracts reviewed did not include the following requirements:</p> <ul style="list-style-type: none"> <li>• That the subcontractor may not use federal funds to influence legislation or appropriations at the state or federal level.</li> <li>• That the subcontractor complete the Certification Regarding Lobbying form, and if necessary, will complete Disclosure of Lobbying Activities forms, and provide these to the contract manager prior to contract execution.</li> <li>• That the subcontractor comply with Section 306 of the Clean Air Act, (42 U.S.C. 7401 et seq.) as amended, Section 508 of the Federal Water Pollution Control Act as amended (33 U.S.C. 1251 et seq.), Executive Order 11738, and EPA Regulations (40 CFR Part 30).</li> <li>• That the subcontractor comply with Executive Order 11246, Equal Employment Opportunity, as amended by Executive Order 11375 and others, and as supplemented in Department of Labor regulation 41 CFR Part 60 and 45 CFR Part 92, if applicable.</li> <li>• That the subcontractor comply with the requirements of the Whistleblower’s Act.</li> <li>• That the subcontractor may not represent to others that it is an agent of the Department or bind the Department by virtue of the contract.</li> <li>• That the subcontractor may not be considered or permitted to be an officer, employee, or agent of the State of Florida.</li> <li>• That the subcontractor may not offer to give nor give gifts to Department employees.</li> </ul>	

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### Inventory

Contract Reference(s): Contract EH003, Attachment I, B.4.c.(2) and Attachment I, F.21.

Monitoring Method: Observation of 60 out of 325 items listed in the inventory tracking report and interview with provider.

Area of Noncompliance	Required by...
2 of 60 items did not have a property identification tag.	Contract EH003, Incorporated Document 21, <i>Tangible Property Requirements and Contract Provider Inventory Form</i>

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### No Findings Identified

Findings were not identified in the following areas of scope.

Topic or Area of Review	Method and Scope
Network management plan	<p>Review of provider policies and procedures and supporting documentation for implementation of the risk assessment, on-site monitoring, and CAP actions.</p> <p>Review of the annual monitoring schedule and on-site programmatic and fiscal monitoring tools.</p> <p>Review of all 5 on-site monitoring files for implementation of the monitoring process and use of monitoring tools.</p> <p>Review of the provider data collection, reporting, and analysis process.</p> <p>Review of provider tools and reports for monitoring of background screening at network providers.</p>
Fraud and abuse plan	Review of the provider fraud, waste and abuse plan and associated documents and interview with the provider regarding the implementation of the plan.
SAPTBG	<p>Review of provider policies and procedures, monitoring reports, and monitoring tools for the SAPTBG.</p> <p>Review of provider tracking of annual units for HIV services and women's services for distinction in funding types and interview with provider.</p>
TANF	Review of documentation of training for network providers and on-site monitoring files for both TANF providers for monitoring results and required monitoring tools and interview with the provider.
ALF case management monitoring	Review of the provider policies and procedures for monitoring ALF case management, the developed monitoring tools, and the monitoring schedule.
State mental health discharge plan	Review of the state mental health discharge plan and implementation of the activities as described in the plan and interview with the provider.

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### No Findings Identified (Continued)

Findings were not identified in the following areas of scope.

Topic or Area of Review	Method and Scope
Background screening	Review of 8 of 11 new employees from April 2014 to January 2015 for level 2 background screening.
Staffing requirements	Review of staffing plan and interview with provider.
Employment eligibility verification	Review of 8 of 11 newly hired employees from April 2014 to January 2015 for I-9 forms and associated E-Verify case documentation, observation of the provider's website, and interview with the provider.
HIPAA privacy	Review of provider policies and procedure and interview with provider.
Abuse reporting	Review of the provider's policy and procedure and interview with provider.

### Core Topics Excluded from Scope

Certain topics were excluded from the scope of review. Details are provided here.

Topic or Area of Review	Additional Information
Whistleblower's Act, incident reporting, information security, and confidentiality.	These topics were monitored in fiscal year 2013-2014 by Contract Oversight. Monitoring of certain administrative requirements is limited to once every three years by 402.7306, F.S. as the provider is accredited by the Council on Accreditation.
Mandatory reporting to the Inspector General	This is not a requirement of the contract.

This contract oversight monitoring was conducted in accordance with CFOP 75-8. It was led by Zenaida Panajon. The team members were Nichelle Jackson and Charles Brazil.

Please contact Fred Carey, North Florida COU Manager, at (904) 485-9712 with any inquiries regarding this monitoring.





## 2014-2015 Contract Oversight Report of Core Scope Monitoring Results

State of Florida  
Department of  
Children and Families

Diane Dusenbury, MBA, MEd  
Chief of Contract Oversight

South Florida Contract Oversight Unit  
Report 1415-2681  
March 30, 2015

### South Florida Behavioral Health Network, Inc. Contract KH225

The Department of Children and Families (DCF) Contract Oversight Unit (COU) monitored South Florida Behavioral Health Network, Inc. (SFBHN), for compliance with some contractual requirements. The scope was limited to topics identified as core topics, to be monitored for all contracts, and to any topics identified as core by relevant programs. Contract managers were also invited to add topics to the monitoring scope. Topics were limited or removed from scope if the monitoring would duplicate the information from other independent review entities already in the contract manager's file.

The provider declined to have an exit conference on March 23, 2015. For the purpose of issuing the report, this date was considered the completion of the monitoring.

This report is produced using a snapshot perspective of contract compliance at a point in time. For complete information on the provider's compliance with contract terms and conditions, please contact the contract manager.

The purpose of this report is to provide information to the contract manager and to programs about provider noncompliance with the contract, as required by section 402.7305, Florida Statutes (F.S.) and by Children and Families Operating Procedure (CFOP) 75-8.

Contract KH225, Attachment I, A.2.a. states:

- (1) The Department is contracting with South Florida Behavioral Health Network Inc., as a Managing Entity, to develop, implement, administer, and monitor a behavioral health Safety Net for persons receiving uncompensated care, pursuant to state and federal law, within the annual appropriation...*
- (2) The Department is contracting with the Managing Entity to subcontract with qualified Network Service Providers, to provide publicly funded Behavioral Health Services pursuant to s.394.9082, F.S., that are located within the following county(ies): Miami-Dade and Monroe Counties.*

## **2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results**

The following abbreviations are used in this report.

ALF = Assisted Living Facility

CFR = Code of Federal Regulations

F.A.C. = Florida Administrative Code

HIPAA = Health Insurance Portability and Accountability Act

IRAS = Incident Reporting and Analysis System

MOU = Memorandum of Understanding

PATH = Projects for Assistance in Transition from Homelessness

SAPTBG = Substance Abuse Prevention and Treatment Block Grant

TANF = Temporary Assistance to Needy Families

# 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

## Findings

### Incident Reporting

Contract Reference(s): Contract KH225, Standard Contract, 12.

Monitoring Method: Review of SFBHN policy and procedures, review of 20 critical incidents out of 61 incidents reported in the provider's internal incident reporting system from July through December 2014, and interview with provider.

Area of Noncompliance	Required by...
4 of 20 critical incidents reviewed reported by network providers were not entered into IRAS timely. <sup>1</sup>	CFOP 215-6, 6.a.(4)
1 of 4 incidents that required immediate necessary emergency contacts, such as 911, did not have the contacts made.	CFOP 215-6, 6.a.(3) and 6.b.(4)

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<sup>1</sup> 3 were entered 1 day late.  
1 was entered 7 days late.

# 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

## Employment Eligibility Verification

Contract Reference(s): Contract KH225, Standard Contract, 35.a.vi.

Monitoring Method: Review of 12 employee records for completion of the I-9 form and E-Verify requirements from a total of 19 staff hired January through December 2014, review of provider E-Verify policies and procedures, observation of posted notices, and interview with provider.

Area of Noncompliance	Required by...
<p>Of 12 I-9 forms and E-Verify case documentation reviewed:</p> <ul style="list-style-type: none"><li>• 2 forms were not completed by the employee prior to or on the date of hire.</li><li>• 1 form was completed and signed by the provider 1 day late.</li><li>• 1 E-Verify case verification report was completed 1 day late.</li></ul>	<p>8 CFR 274a.2(b)(1)(i)(A) 8 CFR 274a.2(b)(1)(ii) E-Verify MOU II, C.7.</p>

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### No Findings Identified

Findings were not identified in the following areas of scope.

Topic or Area of Review	Method and Scope
Data submission requirements	Review of policies and procedures, review of data tracking process for timeliness and accuracy, and interview with provider.
Subcontracts and network provider management	<p>Review of 12 network provider subcontracts for required language and interview with provider.</p> <p>Review of the network service provider management plan, the annual monitoring schedule, and support documentation and working papers for all 12 subcontract monitorings performed by the provider from January through December 2014 and interview with provider.</p> <p>Review of corrective action plans resulting from 11 of 12 subcontract monitorings from January through December 2014, review of provider policies and procedures, and interview with provider.</p>
Reintegration	Review of the provider reintegration plan and supporting documentation for community planning and collaborative activities, including meeting agendas and minutes for re-integration services, and interview with provider.
TANF monitoring	Review of 2 of 4 subcontract monitorings of TANF services performed by the provider from January to December 2014 for provider monitoring of client eligibility, outreach services, client treatment plans, progress notes and child welfare services.
ALF case management monitoring	Review of all 5 subcontract monitorings of ALF case management providers from January through December 2014, review of SFBHN's annual monitoring schedule, and interview with provider.
PATH	Review of both subcontract monitorings for PATH subcontracts performed by the provider from January through December 2014 and interview with provider.

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### No Findings Identified (Continued)

Findings were not identified in the following areas of scope.

Topic or Area of Review	Method and Scope
SAPTBG	Review of 2 SAPTBG set aside subcontracts and monitoring support documentation from all 2 such subcontracts that were monitored by the provider from January through December 2014, review of policies and procedures, review of SFBHN's annual monitoring schedule, and interview with provider.
Staffing requirements	Review of organizational chart, job descriptions, duties, and assignments and interview with provider.
Information security	Review of 11 of 16 records of employees with access to Department information for completion of the latest Department security awareness training and signed DCF security agreements, review of encryption requirements, and interview with provider.
Administrative requirements	Review of provider policies and procedures for HIPAA privacy and data security, abuse reporting, whistleblower's act, and client confidentiality and interview with provider.

### Core Topics Excluded from Scope

Certain topics were excluded from the scope of review. Details are provided here.

Topic or Area of Review	Additional Information
Mandatory reporting	This is not a contractual requirement.
Background screening for Managing Entity personnel	This is not a contractual requirement.

This contract oversight monitoring was conducted in accordance with CFOP 75-8. It was led by Brian Browne. The team members were Ben Nwigwe and Fred Victor.

Please contact Fred Victor, South Florida COU Manager, at (786) 257-5078 with any inquiries regarding this monitoring.



## 2014-2015 Contract Oversight Report of Core Scope Monitoring Results

State of Florida  
Department of  
Children and Families

Diane Dusenbury, MBA, MEd  
Chief of Contract Oversight

North Florida Contract Oversight Unit  
Report 1415-2617  
July 10, 2015

### **Southeast Florida Behavioral Health Network, Inc. Contract IH611**

The Department of Children and Families (DCF) Contract Oversight Unit (COU) monitored Southeast Florida Behavioral Health Network for compliance with some contractual requirements. The scope was limited to topics identified as core topics, to be monitored for all contracts, and to any topics identified as core by relevant programs. Contract managers were also invited to add topics to the monitoring scope. Topics were limited or removed from scope if the monitoring would duplicate the information from other independent review entities already in the contract manager's file.

The provider was offered the option of having an exit conference between June 17, 2015 and July 1, 2015. The provider did not schedule an exit during this time, so for the purpose of issuing the report, the latter date was considered to be the date of completion of the monitoring.

This report is produced using a snapshot perspective of contract compliance at a point in time. For complete information on the provider's compliance with contract terms and conditions, please contact the contract manager.

The purpose of this report is to provide information to the contract manager and to programs about provider noncompliance with the contract, as required by section 402.7305, Florida Statutes (F.S.) and by Children and Families Operating Procedure (CFOP) 75-8.

Contract IH611, Attachment I, A.2.a. states:

*The Department is contracting with Southeast Florida Behavioral Health Network, as a Managing Entity, to develop, implement, administer, and monitor a behavioral health Safety Net for persons receiving uncompensated care, pursuant to state and federal law, within the annual appropriation.*

## **2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results**

The following abbreviations are used in this report.

CAP = Corrective Action Plan

CFR = Code of Federal Regulations

HIPAA = Health Insurance Portability and Accountability Act

IRAS = Incident Reporting and Analysis System

MOU = Memorandum of Understanding

SAPTBG = Substance Abuse Prevention and Treatment Block Grant

TANF = Temporary Assistance to Needy Families



# 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

## Findings

### SAPTBG Monitoring

Contract Reference(s): Contract IH611, Attachment I, Exhibit A

Monitoring Method: Review of the contract requirements for monitoring and administration of SAPTBG funds, interview conducted with provider.

Area of Noncompliance	Required by...
<p>The provider did not have documentation of the following:</p> <ul style="list-style-type: none"><li>• Network providers having policies and procedures relating to treatment services for pregnant women, and where appropriate to ensure that families are able to remain together when parents require treatment.</li><li>• Network providers that reach 90% capacity and monitoring procedures for monitoring of capacity.</li><li>• An annual evaluation of the procedures and activities undertaken to comply with the block grant requirements.</li><li>• Ensuring that block grant funding is not expended on restricted activities.</li><li>• Standardized monitoring tools.</li></ul>	<p>Contract IH611, Attachment I, Exhibit A, 2.4a.iii., 2.5b., 2.11, 2.13, and 3.2b.</p>

# 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

## Network Management Plan

Contract Reference(s): Contract IH611, Attachment I, B.1.a.(4)(a)

Monitoring Method: Review of the network management plan submitted to and approved by the Department for implementation of elements of the plan and interview with provider.

Area of Noncompliance	Required by...
The provider did not have documentation of the quarterly financial statements for network providers.	Network Management Plan

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### Subcontracts

Contract Reference(s): Contract IH611, Attachment I, B.3.

Monitoring Method: Review of 10 of 49 network provider files for inclusion of required contract language and documents. Review of 22 invoices for the 10 subcontracts for January 2015 through March 2015 for timeliness of payment.

Area of Noncompliance	Required by...
All 10 subcontract agreements did not specify that the network providers must supply all equipment necessary to provide services.	Contract IH611, Attachment I, B.4.c.(1)
All 10 subcontract agreements did not include the tangible property requirements.	Contract IH611, Attachment I, B.4.c.(2)
1 subcontract file for a provider required to be licensed did not have a copy of the license in the file.	Contract IH611, Standard Contract, 8.f.

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### Employment Eligibility Verification

Contract Reference(s): Contract IH611, Attachment I, D. 6.

Monitoring Method: Review 2 of 2 newly hired employee records for completion of I-9 forms and E-verify requirements, observation of posted notices, and interview with provider.

Area of Noncompliance	Required by...
Of the 2 I-9 forms reviewed: <ul style="list-style-type: none"><li>• 1 form was signed but dated by the employee with her date of birth.</li><li>• 1 form was signed by the employee 3 days after the date of hire.</li></ul>	8 CFR 274a.2(b)(1)(i)(A)
1 of 2 E-verify cases was submitted 20 days late.	E-Verify MOU II, C.7.

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### No Findings Identified

Findings were not identified in the following areas of scope.

Topic or Area of Review	Method and Scope
Monitoring of network providers	Review of the provider risk assessment tool and implementation of the risk assessment for all 10 network providers that were monitored; review of the provider monitoring schedule for distinction between on-site or desk reviews; review of policies and procedures and tools for the required scope of monitoring; review of the monitoring tools, documentation, and reporting for all 10 on-site monitoring visits for implementation of policies and procedures and scope of monitoring; and review of background screening monitoring tools for all 10 network provider on-site monitoring activities.
Corrective action plan process	Review of the policies and procedures and CAP process and review of 3 of 3 provider CAPs for implementation of the process.
Data collection, reporting, and analysis	Review of the policies and procedures for data collection, reporting, and analysis for contract requirements and review of the technology and data management plan for implementation of the plan.
Fraud, waste, and abuse plan	Review of policies and procedures and interview with provider for implementation of the plan.
State hospital reintegration plan	Review of the implementation of the plan and interview with provider.
Assisted living facilities monitoring	Review of the provider monitoring tool for required elements and documentation of 2 of 2 network providers that were monitored for implementation of the monitoring tool.
TANF monitoring	Review of the provider monitoring tool for required elements and the documentation of the 1 network provider that was monitored for implementation of the monitoring tool.

## 2014-2015 DCF Contract Oversight Report of Core Scope Monitoring Results

### No Findings Identified (Continued)

Findings were not identified in the following areas of scope.

Topic or Area of Review	Method and Scope
HIPAA privacy	Review of provider policies and procedures and interview with provider.
Level 2 background screening	Review of 2 of 2 employment files for new hires for results of initial level 2 background screening.
Incident reporting	Review of provider incident reporting policies and procedures and 20 of 54 reportable critical incidents from January through March 2015 for reporting in IRAS.
Staffing levels	Review of the implementation of staffing level requirements and interview conducted with the DCF contract manager.
Information security	Review of 14 of 14 employee files for completion of the Department's latest security awareness training and signed security agreements, review of data security policies and procedures, and interview with provider.
Administrative policies and procedures	Review of provider policies and procedures for abuse reporting, client confidentiality, and Whistleblower's Act.

This contract oversight monitoring was conducted in accordance with CFOP 75-8. It was led by Nichelle Jackson. The team members were Charles Brazil and Zenaida Panajon.

Please contact Fred Carey, North Florida COU Manager, at (904) 485-9712 with any inquiries regarding this monitoring.