

NORTHCARE COORDINATING AGENCY RISK-BASED PROVIDER NETWORK MONITORING PLAN

NorthCare Coordinating Agency shall monitor the performance of its contracted network of 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 by the NorthCare Coordinating Agency will be commensurate with the degree of risk assessed.

It should be noted that a single event can occur that would cause the NorthCare Coordinating Agency to change the assessed risk level of a particular provider. NorthCare Coordinating Agency 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 its provider risk assessment.

MINIMUM MONITORING ACTIVITIES – ALL PROVIDERS

- 1) NorthCare Coordinating Agency personnel shall document routine ongoing contacts 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) NorthCare Coordinating Agency will collect, analyze, and use all available data to assess provider risk.
- 3) All providers are subject to an on-site review by NorthCare Coordinating Agency personnel to document the degree to which the contractor is in compliance with published performance standards annually. The site review will be documented on approved forms and findings communicated to providers. Corrective action requirements will be detailed in this communication.
- 4) For those providers funded on an other than fee-for-service basis, NorthCare Coordinating Agency personnel will review financial status reports (FSR's) submitted to determine the following :
 - a. Timeliness and accuracy
 - b. Budgetary compliance
 - c. Items to be further evaluated
 - d. Financial requirements being met (i.e. matching, limitations on administrative cost, etc.)
 - e. Proper certifications
- 5) If warranted, NorthCare Coordinating Agency personnel will request an explanation and documentation of any questionable items from the FSR review.
- 6) NorthCare Coordinating Agency will provide written feedback to providers for the purpose of letting them know where a problem exists and, if applicable, requiring corrective action.
- 7) NorthCare Coordinating Agency 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

NorthCare Coordinating Agency will assess the risk associated with a particular provider according to the criteria established on the following page. 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 one 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

NorthCare Coordinating Agency will assess the risk associated with a particular provider according to the criteria established on the following page. 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 not have any high risk characteristics and may display several low risk criteria.

- 1) Providers who are assessed as Moderate Risk may have special monitoring arrangements for the dimensions that are assessed as high risk.
- 2) 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

NorthCare Coordinating Agency will assess the risk associated with a particular provider according to the criteria established on the following page. 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 of 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 may have additional special monitoring arrangements for the dimensions that are assessed as high risk.
- 2) 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.

**RISK ASSESSMENT RUBRIC
NORTHCARE COORDINATING AGENCY SUBCONTRACTOR MONITORING PLAN**

DIMENSION	MINIMUM RISK	MODERATE RISK	HIGH RISK
Routine Contacts	Routine communications are characteristically unremarkable in relation to degree of CA exposure to risk	Routine communications often indicate provider inexperience or uncertainty, moderate organizational risk-taking, infrequent but poor judgment	Significant concerns about management competency or service delivery adequacy as determined through routine communication
Informal Site Visits (Routine Business Matters)	Observations during routine on-site contacts characteristically unremarkable	Observations during routine, informal on-site contacts lead CA professionals to question quality of care, competency, fiscal management, or other pertinent risk factors	Observations during routine, informal, on-site contacts raise significant quality, competency, fiscal management, or related concerns
Contract Compliance Data	Contractor is consistently within tolerance limits	Contractor is consistently within tolerance limits, with occasional lapses	Contractor is inconsistent
Provider Performance Data	Contractor is consistently within tolerance limits	Contractor is consistently within tolerance limits, with occasional lapses	Contractor is inconsistent
Provider Utilization Data	Contractor's utilization trends are as projected by the CA	Contractor's utilization trends are inconsistent or somewhat higher than CA projections	Contractor's utilization trends are very inconsistent or are significantly higher than CA projections
Provider Financial Data	Provider fiscal data shows prudent fiscal management	Provider fiscal data shows prudent fiscal management with no more than one minor concern	Provider fiscal data shows prudent fiscal management with more than one minor concern, or one serious concern
Provider Outcomes Data	Provider outcomes data is acceptable	Provider outcomes data is acceptable, but some concern is noted	Provider outcomes data is acceptable but serious concerns are noted

**RISK ASSESSMENT RUBRIC NORTHCARE COORDINATING AGENCY
SUBCONTRACTOR MONITORING PLAN**

DIMENSION	MINIMUM RISK	MODERATE RISK	HIGH RISK
Provider Grievance Data (Consumer Based)	There is no grievance data or grievances are very minor and resolved satisfactorily	There is some grievance data and some grievances are unresolved or not resolved satisfactorily	There is a body of grievance data that is considered significant; unresolved or poorly resolved grievances
Provider Satisfaction Data (Consumer Based)	Consistently high levels of consumer satisfaction are documented with no or very few undesirable comments	Consistently high levels of consumer satisfaction with few undesirable comments or repeated undesirable comments from a prior period	Consumer satisfaction below regional average or repeated problems from prior periods or uncorrected patterns of performance
Complaints from Public/Stakeholders (Non-Consumer)	No public complaints	One or two public complaints	Three or more public complaints
Annual Audit or Financial Statement	Auditor's opinion is unqualified	Auditor's opinion is unqualified; some minor internal control concerns	Auditor's opinion is qualified or there are significant internal control weaknesses
Financial Status Reports	Expenditures in line with budget; submitted on time and accurately; all financial requirements met	Expenditures in line with budget; requests line item transfers occasionally; usually submitted on time and accurately; minor variances with financial requirements	Expenditures not in line with budget; frequent requests for line item transfers; submitted late or inaccurately on more than one occasion; more significant variances with financial requirements
Formal Site Reviews	Well prepared, random chart pulls reveal high degree of compliance with performance standards; prior years' corrective action plans (if any) fully implemented according to plan time frames	Well prepared, random chart pulls reveal high degree of compliance with standards with some generally minor exceptions; prior years' corrective action plans (if any) fully implemented with minor exceptions	Poorly prepared, random chart pulls reveal inconsistent compliance with standards; prior years' corrective action plans show repeat citations or not fully implemented
Accrediting Body Reports	Unconditional Accreditation with Consultative Recommendations	Unconditional Accreditation with Fewer than Three correctable findings	Conditional or Provisional Accreditation