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Communities Connected *for* Kids

Title Contract Monitoring Procedures		**Number** 802	
Department: Quality management	**Owner** Director of Quality Management	**Regulatory Authority/ Related Policies:** Fl Statue, Fl Administrative Code	**Attachments:** Provider Services Manual

Effective Date:	**Last Revision:**	**Review Date:**
November 2013	March 2026	March 2026

Purpose:

Communities Connected *for* Kids will conduct monitoring of client services provided by each network provider. The contract monitoring encompasses administrative and programmatic standards expected to be met by the network providers according to the Communities Connected *for* Kids Standard Contract, its attachments, Florida Statutes (F.S.), Florida is Administrative Code (F.A.C.), federal regulations and Communities Connected *for* Kids policy.

Policy:

Contract Monitoring of Network Providers

1. All contracts and/or agreements with network providers will have contract oversight and monitoring by the CCKids Contracts Department and the CCKids Quality Management Department.
2. Communities Connected *for* Kids Quality Management will conduct formal contract monitoring to ensure compliance will all contract terms in accordance with the Client Services Monitoring Manual.
3. Communities Connected *for* Kids will continually evaluate providers in the network through analysis of performance outcomes, satisfaction survey data, and other data reports.
4. When possible and to reduce duplicate effort, Communities Connected *for* Kids will coordinate monitoring efforts with other funding entities.

Please refer to the *Client Services Monitoring Manual* for a complete guide of monitoring activities and procedures. (Appendix B)

Approved by:

DocuSigned by:
Carol DeLoach
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Carol DeLoach, CEO

COMMUNITIES CONNECTED FOR KIDS

SERVING CHILDREN IN INDIAN RIVER, MARTIN, OKEECHOBEE, AND ST. LUCIE COUNTIES – CIRCUIT 19

CLIENT SERVICES MONITORING MANUAL

Latest Revisions:
March 2026

Chapter 1

GENERAL PROVISIONS

A. Purpose

This monitoring operating manual (the Manual) describes Communities Connected for Kids (CCKids) is client services monitoring processes and provides a general guide for conducting such monitoring. The monitoring outlines administrative, operational and programmatic practices used by CCKids to evaluate its network providers and/or client services in accordance with standards of practice. This Manual is defined as a dynamic/living document, which is therefore subject to periodic revision.

B. Authority

Section 409.1671, F.S.

2 C.F.R. §200.332 Requirements for pass-through entities.

All pass-through entities must:

(c) Consider imposing specific subaward conditions upon a subrecipient if appropriate as described in §200.208 Specific conditions.

2 C.F.R. §200.332 Requirements for pass-through entities.

All pass-through entities must:

(g) Consider whether the results of the subrecipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the pass-through entity's own records.

2 C.F.R. §200.332 Requirements for pass-through entities.

All pass-through entities must:

(h) Consider taking enforcement action against noncompliant subrecipients as described in §200.339 and in program regulations.

C. CCKIDS's Monitoring Plan

CCKids monitoring plan includes the review of administrative, operational and programmatic components related to CCKids client services provision that are evaluated/tested through a variety of methods and source documents in an effort to achieve quality control and quality assurance by earlier identifying areas for quality improvement in order to assist CCKids in its mitigation of risk.

D. Overview of CCKIDS Monitoring Practices:

1. All CCKids funded network providers of client services are to optimize their CCKids provided allocation and integrate the inputs necessary to meet pre-defined objectives of their program and/or client services delivery.
2. In order to maximize limited resources, to minimize disruption to network providers, to reduce duplicative monitoring activities and to work to improve efficiencies, CCKids integrates administrative, operational and programmatic elements to the greatest extent possible during its monitoring reviews through the utilization of varied evaluative sources. For example:
    a) CCKids works to limit administrative monitoring of its child welfare network providers and limit administrative and programmatic monitoring of its Substance Abuse and Mental Health network providers to once every three (3) years or as needed, except for determining that services paid for are being provided, investigating complaints, or suspected problems, monitoring compliance with state and federal laws, regulations, and rules if doing so would not be duplicative of accreditation standards, if the network provider is accredited by the joint commission on Accreditation of Healthcare Organizations, the Commission on Accreditation of Rehabilitation Facilities, or the Council on Accreditation of Children and Family Services.

b) CCKids accepts results of monitoring from state agencies or other Florida Community Based Care Lead Agencies when the standards monitored by these entities distinctly and specifically meet or exceed those of CCKids.
c) CCKids may seek assistance from other funding entities, either public or private, to monitor a CCKids network provider's services through joint monitoring aspects. Joint monitoring is undertaken when economies of time, effort and resources can be achieved through mutual cooperation, as it presents a consolidated and coordinated approach to network providers, reduces the administrative burden associated with individual monitoring sessions, and promotes consistency in reviews and reports. CCKids participates in requests for joint monitoring specifically when CCKids monitoring objectives are to be satisfied by such joint reviews.

3. All CCKids funded programs, especially within the geographic area of Circuit 19, are monitored in concert with the level of risk and frequency of monitoring indicated by CCKids Risk Assessment Matrix.

4. Completed CCKids network provider monitoring reports, related findings and/or recommendations are distributed to the network provider, their board chair (where one is present), and to the CCKids Contract Management Department. CCKids indicated significant monitoring findings require the network provider to submit a corrective action plan (CAP) to address each cited issue. These CAPs are then subsequently reviewed by the CCKids Contract Management Department for acceptance, and this Department then quarterly reviews the network provider's CAP progress and shares those review results with the CCKids Quality Department and the network provider.

5. Monitoring working documents, work papers, and back-up evaluation materials for reporting are maintained in files or electronically by CCKids Quality Management Department and CCKids Contracting Department maintains CCKids funded network provider contract files. Both the monitoring files and the contract files are archived and are retained for a minimum of six (6) years, following the ending term of each said CCKids network provider contract/services period. When an audit has been initiated or when there is ongoing litigation pertinent/related to the CCKids network provider contract/services, these records are retained until those matters are resolved.

E. **"Real-Time" Monitoring**

In an effort to ensure all CCKids network providers meet, maintain, and consistently provide client services on behalf of CCKids that are indicative of CCKids standards, CCKids implements an ongoing "Real-Time" monitoring process. This Real-Time process includes:

1. Formative Evaluation – establishes the need for specific services and an associated process for screening/credentialing of network providers to provide such services. The gathering of this information is often qualitative in nature and its focus is at the inception/start of the program or services.
2. Process Evaluation –the ongoing daily oversight of the delivery of services to ensure the project is yielding or will yield the desired outcomes needed. The gathering of this information is often acquired from several different areas of concentration and from varied sources, is often both qualitative and quantitative in nature, and its focus is to capture information between the formative and summative stages of the program or services.
3. Summative Evaluation – assesses the value of the completed activities/services and whether the program or services yielded the desired outcomes needed. The gathering of this information is often acquired from several different sources and takes into account all information gleaned during the formative and process evaluation periods and is therefore both qualitative and quantitative in nature.

At any point in time, CCKids may elect to conduct an informal/formal monitoring and/or request a corrective action plan of any of its network providers (outside of the pre-determined monitoring schedule established by the CCKids Quality Management Director in accord with the CCKids Risk Assessment Matrix) for any of its client services or related aspects when/if CCKids believes that its ability to provide quality client services is being impeded or is not in line with CCKids standards and practices.

F. **Accreditation**

CCKids is committed to ensuring provision of the highest quality services to its clients. Accordingly, CCKids has expectations that where accreditation is generally accepted nationwide as a clear indicator of quality service, the majority of CCKids network providers will either be accredited, have a plan to meet national accreditation standards, or will initiate one within a reasonable period of time.

G. **CCKIDS Ethics**

1. CCKids employees are required to conduct themselves in accordance with CCKids Policies and Procedures.
2. CCKids employees are prohibited from revealing to unauthorized persons any client names or other confidential/proprietary information obtained from CCKids or from a network provider.
3. CCKids employees are also expected to follow the employee conduct standards that are set forth in the CCKids Employee Handbook.

H. **Conflict of Interest**

Monitors are required to render impartial and unbiased judgments in their reviews. Therefore, CCKids Quality Management Specialists that are assigned as Quality Monitoring Reviewers (QMR) are required to complete a Conflict-of-Interest Statement before monitoring undertakings. These QMR Conflict of Interest Statements will be reviewed by the Quality Management Director and maintained in the respective quality management file related to each monitoring review as a part of the working papers. In cases where a perceived or actual conflict of interest is noted, the Quality Management Director shall determine if the respective quality management specialist is to participate in the monitoring.

I. **CCKIDS Monitoring Work Papers**

The CCKids monitoring review work papers are all materials collected, utilized, reviewed, analyzed, and maintained by the CCKids QMR during any authorized monitoring review. These work papers exemplify all activities involved in carrying out the monitoring review which provide permanent evidence of information about past events obtained during the review. The monitoring review work papers service to document the CCKids QMR's work (information obtained, methods and procedures used to review, and tests performed), and assist in providing evidence and support by substantiating the QMR's conclusions, determinations, findings and/or recommendations reached pertinent to the monitoring review. These work papers establish a resource record for strengths and/or deficiencies of CCKids funded network provider client services and preserve documentation to aid in planning and conducting future prospective monitoring reviews. Work papers may include, but are not limited to completed monitoring review tools utilized, copies of original network provider abstracts, documents/papers, and records, QMR notes from interviews/observations, etc.

The CCKids QMR maintains a properly identified master monitoring electronic review file for all authorized monitoring formal reviews conducted. This file contains all of the monitoring work papers related to the specific monitoring review. Throughout the monitoring review, all monitoring work papers are required to be treated as confidential and are required to be safeguarded at all times by maintaining the papers in a secure environment which is out of public view. These monitoring review work papers are retained by CCKids and are considered the property of CCKids; they are not accessible to the network provider (or any related affiliate) while the monitoring review is ongoing or being conducted.

J. **CCKids Monitoring Related Forms and Tools**

All Forms and Monitoring Tools cited throughout this Manual are maintained on the CCKids intranet under the header "Documents, Quality Management", incorporated herein by reference, and are subject to changes. These items include, but are not limited to:

1. CCKids Administrative, Operational, and Programmatic Monitoring Tools
2. CCKids QMR Monitoring Forms
3. CCKids QMR Monitoring Guide Items

Chapter 2

MONITORING PLAN

A. General Monitoring Roles & Responsibilities

1. The Quality Management Director is responsible for:

   a. Developing a tentative Annual Monitoring Schedule. This tentative schedule should be completed within the first ninety (90) days of each CCKids fiscal year, and the schedule pertains to pre-planned CCKids formal monitoring reviews that are slated to be conducted with specific CCKids funded network providers within that respective fiscal year.

   b. Authorizing any informal/formal monitoring review to be conducted.

   c. Assigning a CCKids Quality Management Specialist as a Monitoring Reviewer (QMR) who is the single point of contact responsible for conducting facilitation, coordination and completion of all activities related to any prescribed authorized monitoring(s). The CCKids Quality Management Director may designate himself as the QMR in some cases.

   d. Outlining scope of the monitoring review while aligning benchmark activities with associated timelines of completion for all prescribed activities necessitated in each monitoring undertaking.

   e. Selecting mode of formal final presented monitoring report presentation delivery.

   f. Overseeing and ensuring all monitoring activities and related reporting are conducted in accordance with CCKids associated practices contained, but not limited to, those set forth in this Manual.

2. The QMR is responsible for:

   Following all associated activities and processes outlined in this Manual under Chapter 3 Implementation of Monitoring, and any others as deemed necessary from time to time by CCKids, for all monitoring activities related to any CCKids Quality Management Director authorized informal/formal monitoring review.

3. Collaboration: In line with CCKids Real-Time Monitoring practices, ongoing CCKids daily informal reviews and network provider technical assistance (indicated, required, or requested) occurs through a variety of different means conducted by different CCKids units/departments throughout each fiscal year. These different reviewing CCKids parties' information is used during CCKids informal/formal monitoring review periods, helps to provide data/information/statistical trends that better CCKids System of Care, and allows for earlier identification of issues/problems/findings, affording more timely resolve.

B. Methods Used in Monitoring

CCKids utilizes a variety of evaluation/testing methods in order to achieve its goals in quality control and quality assurance. Below are some of these outlined methods:

1. **Network Provider Screening/Credentialing Methods**—CCKids requests that all inquiring child welfare service organizations/individuals join the CCKids Provider Profiler Network on the CCKids internet. This Network initially captures certain administrative formative information which includes but is not limited to an organization's federal employment identification number/individual's social security number, programs/services offered and some information regarding each, frequency and duration of service offerings and requested unit rate of each service area, and upload of licensure, accreditation, and business financial information. When an informal needed client service area is identified and to be funded by CCKids, CCKids works to match these inquiring individuals/businesses to the needed service area. The basic information collected through the Network along with a variety of other assurance categories are then reviewed by CCKids (i.e. reference checks, evidence of past experience in proposed service area, cost analysis of rates/budgets in the area of service offered, state convicted/suspended vendors list checked, etc.) in order to potentially add them as a CCKids client services preferred network provider/vendor.

2. **Sampling Methods** – is a statistical practice concerned with the selection of a subset of quantifiers from within a larger grouping that serves to yield some knowledge about the whole grouping through a basis (and for the purpose of) making predictions based on statistical inference (drawing conclusions from data that are subject to random variation). CCKids implores this method by either using probability sampling or non-probability sampling through random sampling when reviewing records for monitoring:

    a. Probability sampling - every element of the grouping has a known probability of being included in the sample.

    b. Non-probability sampling –every element of the grouping will not be included in the sample.

        (1) Simple Random sampling – the reviewer insures (usually through the use of random numbers applied to a list of the entire grouping) that each member of that grouping has an equal probability of being selected. The mathematical theory upon which statistical conclusions are based relies on assumptions which are consistent with the random sample.

3. **Case File and/or Other Records Review Methods** – The program or services being reviewed/ monitored may include a single activity or any combination of activities. Determination, guidance, and sample size for which specific files in an area should comprise the review sample will be designated before monitoring occurs. Generally, case files for review may be selected at random and cover the period since the last monitoring review, with particular emphasis on the new/more recent cases which can be expected to provide the best indication of current performance. If this is an initial monitoring review for a new program or services, the reviewer should select a representative sample and/or all cases since the beginning of the program or services. The reviewer should thoroughly examine program participant documentation in the program participant's records and files for each of the cases in the selected sample and determine whether the person received the full level of payments and services purchased by CCKids. Other records reviewed include administrative and programmatic classifications in monitoring and encompass reviews of such items as the CCKids network provider contract file(s), CCKids profiler system, FSFN, and other sources.

4. **Observational Methods** – Part of a sequential process in monitoring that aims to generate hypotheses from observational data by identifying associations between services required and practices witnessed in order to draw conclusions. CCKids implores this method through on-site inspection visits to its funded network provider service locations where the CCKids monitor serves not to judge the actions of the parties being reviewed but simply observes what is going on and reports/draws conclusions based on these observations.

5. **Interview Methods/Group Discussions** – A systematic method of collecting information by interviewing key people who are likely to be well informed about an issue and are willing to answer without bias. CCKids monitors interview clients and/or key network provider personnel of their choosing and conduct these in-person interviews whenever possible and in a location that allows for privacy. When individually interviewed, CCKids uses standardized questions in order to ensure comparability of responses and to reduce bias. Separate standardized interview questions are used for different categorized participants (i.e., personnel, board members, clients, etc.)

6. **Survey Methods** – A descriptive research method of collecting information/data that often cannot be achieved through direct, observational, or interviewing means. Often surveys involve gathering opinions or assessing quality, attitudes and/or characteristics of a wide range of subjects from the user's perspective. CCKids may use cross-sectional surveys to gather information from vendors/providers, stakeholders, internal/external customers, or other related community partners on a variety of products/programs/services at a single point in time or may use longitudinal surveys to collect data over a longer period of time that can be used to trend data for the betterment of the CCKids System of Care. These surveys may be qualitative (e.g., ask open-ended questions) or quantitative (e.g., use forced-choice questions) in nature.

7. **Desk/Remote Review Monitoring Method** – CCKids may elect to conduct limited scope monitoring reviews via a desk review method when it is determined that quality assurance can be sufficiently ascertained by collecting materials/evidence from a network provider through electronic or hardcopy

documents received validation methods where evaluation of these materials provide sufficient detail from which the QMR can draw conclusions, determine findings, and/or make recommendations for improvements based on materials/items that can be reviewed from the QMR's desk. An example of when this method is used is when a network provider presents evidence of materials missing from client files now perhaps in response to a DCF state licensing monitoring report finding. Another example would be where a Desk utilizing the desk review process in conjunction with the risk matrix and the streamlining of monitorings.

8. **Informal Monitoring Method** — Informal monitoring reviews are broadly framed and may be used to periodically assess one or more areas of a network provider program and/or client services in a limited scope monitoring review fashion. The results of these informal monitoring reviews may be used to augment information in formal monitoring review settings or to effect change in different project areas of a program or client services where modifications can result in more productive or efficient outcomes.
9. **Formal Monitoring Methods** — this monitoring can be completed in person, remotely or a combination of the two. Formal monitoring reviews are highly detailed, encompassing formal specifications/requirements, and focus on the reviewer's analysis of a program or services effectiveness by identifying areas of strength or weakness and/or areas for improvement. These formal reviews assess implementation processes, results/outcomes, short-term and long-term goals, outputs, or outcomes based on evidence collected from a variety of sources in order to formulate an overall evaluation of a program or services.

C. **<u>Monitoring Tools, Classifications & Source Documents</u>**

CCKids utilizes a variety of sources to evaluate its network providers and/or client services in accord with standards of practice established by any related network provider program CCKids subcontract file, Florida Statutes (F.S.), Florida Administrative Code (F.A.C.), Children and Family Operating Procedures (CFOP), state and federal regulations and CCKids policies and procedures. CCKids has developed internal monitoring tools that assist in guiding its monitoring reviews. These tools include areas for evaluating CCKids client services network providers in administrative, operational and programmatic areas. Below are the classified areas and some of the associated source documents used in CCKids monitoring reviews:

1. **Administrative Monitoring**—Administrative monitoring is intended to inform the network provider and CCKids whether the network provider is maintaining administrative standards adequate to provide assurance to funders (like CCKids) that services can be provided without the need for any business interruption due to lack of sufficient business/financial integrity of the network provider's organization. The following items are representative, but are not limited to, some of the areas and associated source documents CCKids reviews for administrative monitoring aspects of network providers:
    a. Business/Organizational:
        (1) Current Accreditation Certificate (COA, JAFCO, CARF, etc.)
        (2) Current Licensure (State/Occupational/Business, etc.)
        (3) Current Insurance (General and Professional Liability coverage, etc.)
    b. Fiscal/Financial:
        (1) Completed Florida Single Audits conducted in accordance with 2 CFR Chapter I, Chapter II, Part 200 et al.
        (2) Independent Financial Audits/Reviews conducted by an external entity/source
        (3) Management decision letter, if applicable
        (4) Interim financial statements (e.g. balance sheets, profit/loss statements, etc.)
2. **Operational/Civil Rights Monitoring** —Operational monitoring is intended to inform the network provider and CCKids whether the network provider is delivering services in line with established standards in order to provide assurance to funders (like CCKids) that services can be provided without the need for any business interruption due to lack of sufficient operational processes and procedural methods of the network provider's organization. The following items are representative, but are not limited to, the areas and associated source documents CCKids reviews for administrative monitoring aspects:
    a. Data & Information Systems Security:

(1) Named Data Security Officer Identified
(2) Personnel Security Awareness Training Certificates of Completion Maintained in Personnel Files

b. Civil Rights Adherence and Monitoring:
(1) Applicable sub-contracted providers will be monitored for Personnel Signed Certification Form regarding Understanding of ADA, Section 504 maintained in Personnel Files, review of the Communication forms, Waiver forms, applicable Policy and Procedures, Auxiliary Aid Plans, ADA training documentation, proper poster size and placement, face to face meeting with the SPOC (Point of Contact)
(2) Records and/or Policies & Procedures that evidence all benefits, services, and facilities are available to all applicants equally without regard to race, color, national origin, sex, age, religion or handicap

c. Incident Reporting & Client Risk Prevention
(1) Statistical information regarding timeliness and accuracy (or level of completeness) ascertained from CCKids Incident Reporting System

3. **Programmatic Monitoring**—Programmatic monitoring is intended to inform the network provider and CCKids whether the network provider is delivering services in line with established standards in order to provide assurance to funders (like CCKids) that services can be provided without the need for any business interruption due to lack of sufficient programmatic service delivery integrity of the network provider's organization. The following items are representative, but are not limited to, the areas and associated source documents CCKids reviews for administrative monitoring aspects:

a. Client Services Delivery
(1) Client File Reviews: Statistical information formulated regarding health, safety & well-being
(2) Performance Measures Review: Statistical information formulated regarding outputs/outcomes
(3) Salient program/services tasks or deliverables show evidence of timely and accurate completion
(4) FSFN & other data sources for information

b. Client Services Personnel
(1) Personnel Background Checks and Clearance in Personnel Files
(2) Personnel files show evidence of credentials of staff member meet qualifications of personnel position assigned to staff member

4. **Quarterly monitoring schedule:** During the first quarter monitoring all administrative, personnel and case files. The second quarter monitoring includes a survey of the Providers which the stakeholder can give input as to the services they are receiving from the Provider being monitored. The third quarter monitoring includes a review of recruitment plans any corrective action items that were a result of the 2 previous quarterly monitoring and the fourth quarter monitoring allows for a complete overview of the Provider. All quarterly intervals include the ongoing review of their performance measures and program outcomes.

D. **<u>Classification of Monitored Network Provider Client Services</u>**

1. **Programmatic Services**—Characteristically, these client services (e.g., Dependency Case Management services) are delivered by network providers classified as sub recipients, encompass a larger scope of service, require the highest level of oversight programmatically and fiscally, and require in-depth monitoring reviews.

2. **Statewide CBC Residential and Shelter Group Care**—characteristically, these services (e.g., Residential and Shelter facilities) are delivered by network providers primarily classified as sub recipients. Services involve the utilization of state licensed facilities that house groups of child welfare dependent children (while ensuring each child's safety and well-being) where the provider accepts children based on individual provider admission criteria. These services require a moderate level of oversight programmatically and fiscally, and require a moderate level of monitoring achieved through a variety of collaborative sources (e.g. geographically located Community-Based Care Lead Organization's ("Home" CBC) most recent monitoring report and all related corrective action plan follow-up materials

and the most recent state licensing/re-licensing summary reviews and all corrective action plans follow-up materials regarding any critical findings of note, informal/formal visits to the network provider facility, and desk reviews for out of Circuit network providers that includes administrative and some operational and programmatic items)

3. **Ancillary/Incidental Sub recipient Direct Care Client-Related Support Services**—characteristically, these services (e.g. Drug Screening and SA/MH Evaluations) are delivered by network providers classified as vendors. Services relate primarily to educational, translation/interpreter services, mental health and/or substance abuse support needs for children and/or adult caregivers of children involved in the child welfare system, require a lower level of oversight programmatically and fiscally, and require the lowest intensity of monitoring often achieved primarily through survey methods or via review of sampling of finished product aspects.

E. **Medicaid funded client services**

CCKids ascertains its assurances for Medicaid funded client services through state licensure and accrediting bodies associated certifications held by these network providers. CCKids may, at its discretion, participate in or perform informal/formal monitoring reviews, issue surveys on related services, participate in other monitoring related entity joint reviews, when/if CCKids determines its monitoring objectives may be satisfied by such joint reviews. CCKids has a Clinical Services Director who oversees the delivery and associated aspects of these related services.

CCKids Quality Management along with CCKids Contracts Department will complete Foster Care Referrals for CCKids child placed in the licensed APD group home.

F. **Other Monitoring Reviews**

1. **State/Federal Monitoring Required**—DCF or other State/Federal Monitoring of CCKids client services may be indicated. CCKids will follow state/federal prescribed guidelines and engage in monitoring and/or processes that service to ensure CCKids will gain its assurances/monitoring needs as a part of these processes.
2. CCKids may, at its discretion, from time to time require or engage in additional monitoring facets or reviews as CCKids dictates necessary, reasonable and justifiable to reduce CCKids risk and uphold its standards and practices, including CCKids internal department monitorings.

Chapter 3

IMPLEMENTATION OF MONITORING

A. Overview of Implementation of Monitoring Process Steps

1. The CCKids Quality Management Director authorizes a network provider and/or clients' services informal/formal monitoring review and outlines the scope of the monitoring while aligning benchmark activities with associated timelines of completion for all prescribed activities necessitated in each monitoring undertaking.
2. The CCKids Quality Management Director assigns a CCKids quality management specialist team leader (QMR) who will conduct facilitation, coordination and completion activities related to any prescribed monitoring review.
3. The QMR completes a Conflict-of-Interest Statement for the associated monitoring and presents it for approval to the Quality Management Director. Once this item is reviewed and approved, the monitoring review process continues.
4. The QMR selects appropriate monitoring review tools (or portions thereof) necessary to perform the associated network provider and/or client services monitoring.
5. Based on tools (or portions thereof) selected for the monitoring, the QMR then gathers and reviews documentation, data, and/or reports already accessible, readily attainable, or currently in the possession of CCKids. For example:
   a. Reviews of internal CCKids contract files (where applicable) for all needed information/ documents/materials that pertain to or may assist with a monitoring review.
   b. Reviews of the network providers policies & procedures and other administrative / operational / programmatic items which may be posted on the CCKids Profiler system, the network provider's utilized public electronic warehousing system (i.e., FCC Doc Vault), or on file with CCKids in hardcopy, etc.
6. When a formalized, pre-scheduled annual/semi-annual or quarterly monitoring review is to be completed within the respective fiscal year, and/or in other situations when deemed necessary by the CCKids Quality Management Director, the QMR sends a CCKids QMR Monitoring Notification Letter or email to the associated client services network provider with-in thirty (30) calendar days of any scheduled on-site network provider monitoring is conducted. This notification serves to outline the commencement date of the monitoring, requests the submission of advance documents/materials from the network provider (allowing for certain monitoring activities and review of materials to be conducted before any on-site visit to the network provider is held), provides an overview of the areas that will be reviewed, and may request that certain files/documents be pulled and on-hand for the on-site monitoring review.

   When the letter/email requests the submission of advance documents/materials for review from the network provider:

   a. If said documents are not submitted by the network provider within the prescribed time frame, the QMR will follow-up on the matter by issuing a 2nd request notification on the date the items are due. (Note: This 2nd notification will request an explanation from the network provider as to why the materials have not been submitted by the prescribed time frame and require the network provider to denote the timeframe in which the network provider can submit the requested materials. The monitoring report will include a notation as to the untimely submission of these materials and will include any network provider explanation accordingly.)
      (1) If the network provider has provided an explanation acceptable to the QMR of mitigating circumstances which preclude the provider from submitting materials, the QMR will send correspondence accordingly.
      (2) If the network provider's explanation is not acceptable, the QMR will send correspondence denoting that the monitoring report will reflect the network provider's failure to submit these

requested review materials within the prescribed time frame. However, the QMR should accept requested materials for review throughout the monitoring review period outlined.

b. Notwithstanding mitigating circumstances, if the network provider is unwilling or unable to produce the documents requested, the matter will be referred to CCKids Quality Management Director for address. If documents still cannot be achieved/provided, the Director will consult with the CCKids COO (or in their absence, with another member of CCKids Executive Management team). If the materials still are not received, the matter will be referred to CCKids full Senior Management Team for discussion and final determinations.

7. When indicated/appropriate, the QMR may conduct limited scope desk monitoring reviews.

8. When indicated, the QMR conducts network provider and/or client services either remotely or on-site monitoring reviews. This includes, but is not limited to, the following:

   a. Entrance Conference at The Network Provider Site

      The QMR conducts an entrance conference with the network provider's official representatives where a review of the purpose, scope and schedule related to the onsite monitoring is stated. The entrance conference is indicated to include, where possible, the network provider's chief executive officer, financial officer, clinical director and other provider employees and can include one or more board members.

   b. Onsite Monitoring Review

      (1) The onsite monitoring is to occur preferably in network provider of CCKids client services direct service delivery location, but at times may occur at a network provider's administrative location, in a contained, quiet environment suitable for these types of review.

      (2) All network provider client services records, papers or other items necessitated are reviewed by the QMR. QMR safeguards all copies of network provider records/materials and QMR notes made by:

         (a) QMR maintains their notes and copies of network provider confidential papers/records locked in a case or on their person at all times, and QMR is to carry all QMR work papers and notes offsite at the end of each working day.

         (b) No original network provider papers/materials/records are to be taken offsite at any time and all network provider materials are returned by QMR to the network provider at the end of each on-site review monitoring day.

         (c) If the QMR becomes aware, or has reason to believe, that client records or data have been altered or falsified, the QMR shall: immediately notify the CCKids Quality Management Director; document the circumstances and inconsistencies (as fully practicable) by including copies of the suspected documents whenever possible, without alerting the network provider to the QMR's suspicions; and copy any document reflecting network provider non-compliance or inconsistency with a previously submitted report or invoice, as soon after its discovery in order to assist in precluding unavailability or possible later tampering by the network provider.

      (3) The QMR meets throughout the on-site review with the client services network provider and may exchange information that identifies the network provider's strengths and weaknesses and helps the QMR develop preliminary results or conclusions based on available information.

      (4) While reviewing materials, if the QMR finds irregularities in any stage of the administrative, operational, and/or programmatic monitoring that requires immediate attention or action, serves to degrade service delivery to CCKids clients, or indicates questionable financial/managerial practices, it shall report those findings at the time of citations to the CCKids Quality Management Director. In turn, the CCKids Quality Management Director will indicate what remedying action will be taken.

(5) If, while visiting a network provider site, the QMR observes activity which is a threat to the safety or life of any individual, the QMR is obligated to report this immediately to the Florida Abuse Hotline (1-800-962-2873 or TDD 1-800-453-5145), local law enforcement officers (911), emergency medical services, the facility management, and the Quality Management Director (who the notifies the CCKids Chief Executive Officer). In cases of suspected abuse, the QMR is required to call the Florida Abuse Hotline. In other cases, the QMR must use its best judgment in choosing whom to call first.

c. Exit Conference

The QMR conducts an informal exit conference with the network provider's assigned primary point of contact in order to discuss preliminary findings, recommendations, and results of the monitoring with the network provider. The QMR may utilize this meeting to ask further exploratory questions or request explanations of preliminary findings. The exit conference also allows the network provider an opportunity to explain or provide documentation to clear up minor or easily correctable anomalies or errors.

9. The QMR coordinates, communicates, and confers with all entities, individuals, or parties that may be associated or necessitated in the gaining of assurances and/or gathering information related to the monitoring review.
10. The QMR gathers all pertinent statistics and documentation necessary (from a myriad of sources) to fulfill monitoring reporting needs.
11. The QMR assimilates, documents, evaluates, and adequately maintains and preserves work papers, data, and all other assurance items required to generate the resulting final product of the monitoring review.
12. The QMR writes a clear and concise monitoring report (within the prescribed format of the designated template) and reviews the report to ensure accuracy, to ensure inclusions of all needed information, and to ensure reduction of error in basic grammar, spelling, and syntax are met.
13. The QMR internally routes the intended monitoring report to the CCKids Director of Quality Management (and the CCKids Senior Management Team) for review and additional input. If changes are warranted based on feedback, a peer review will be conducted by a fellow CCKids quality management specialist to ensure all items have been addressed in the final report to be issued.
14. The QMR prepares the final report/Summaries (along with any feedback received) to present it to the CCKids Director of Quality Management for final approval. Once final approval is achieved, the QMR Lead will issue this preliminary written report/summary to the associated client services' network provider via e-mail (or hardcopy if e-mail is not available) and will carbon copy the CCKids Director of Quality and the assigned CCKids Contract Manager. At this same time, if applicable, the QMR schedules a final Exit with the network provider either requested by CCKids or the provider, (and designated CCKids relevant personnel) in order to verbally deliver the monitoring presentation by reviewing some of the highlights from the issued report. (Meetings may be via conference call, teleconference, or in-person; mode is selected by the CCKids Director of Quality Management.)
15. If applicable, during the final Exit the QMR instructs the network provider to submit a written corrective action plan (CAP) for any CCKids identified significant findings identified in the monitoring report to the CCKids Contract Manager within thirty (30) calendar days of the verbal presentation. The CAP is a plan created by the network provider's management to improve suboptimal performance through a forward momentum leading to an output/outcome change. The CAP is to address monitoring review areas of noted non-conformance, identified deficiencies, and CCKids recommendations for improvement, and the CAP requires action steps that identify the network provider primary personnel responsible for each step and the anticipated timeframes in which those steps will be completed and change in outputs/outcomes will be realized.
16. After the verbal monitoring presentation, if any corrections or changes to the monitoring report were discussed and agreed upon by CCKids and the network provider during the presentation, the QMR makes

those changes and reissues the final report via e-mail to all the previous recipients and includes the network provider's board chair (where one is present).

17. The assigned network provider CCKids Contract Manager then follows up to collect, review, evaluate, and provide feedback to any network provider on their submitted CAP. During this process, the CCKids Contract Manager confers with the QMR to ensure the network provider's plan is testable and measurable and can effect change on outcomes for the future. Once the network provider's CAP is submitted in a form that can be approved, the CCKids Contract Manager approves the CAP and sends this approval notification to the network provider and the QMR. The CCKids Contract Manager then performs quarterly follow-up CAP reviews and shares the results of those reviews via e-mail with the QMR and the network provider.
18. Subsequent monitoring reviews conducted by QMRs take into account information gleaned as a result of these aforementioned CCKids Contract Manager quarterly follow-up CAP reviews.

d. Remote provider services monitoring will consist of all monitoring materials being sent, accepted, reviewed and analyzed through encrypted email, or confidential drop box. The delivery of documents will be decided between CCKids, and the Provider being monitored.

e. Monitoring Exit conferences may be conducted remotely, if applicable.