

SCO Monitoring Process

This statewide Supports Coordination Organization (SCO) monitoring process is applicable to all qualified SCO providers of supports coordination services funded through the Consolidated and/or Person/Family Directed Support (P/FDS) waiver (waivers).

The SCO monitoring process established by this document excludes Intermediate Care Facilities for persons with Mental Retardation (ICFs/MR), qualified providers of all other waiver services, Vendor Fiscal/Employer Agent (VF/EA) FMS providers, Agency With Choice (AWC) providers and all providers delivering only base-funded services and/or Targeted Service Management (TSM).

As part of the Office of Developmental Programs (ODP) quality management strategy, SCO monitoring must be comprehensive, standardized and measurable. Standard processes, tools and data collection documents assist ODP with verifying that SCO providers are qualified and that supports coordination services are provided in compliance with the waivers, regulations, policies and procedures and the current *Provider Agreement for Participation in Pennsylvania's Consolidated and P/FDS Waivers* (Provider Agreement) or any approved revisions.

SCO monitoring must address the assurances defined in the waivers in accordance with 42 CFR § 441.302, so ODP can verify compliance with federal regulations and the waivers. As the monitoring entity, ODP must take steps to ensure the health and welfare of individuals at all times. If ODP determines that there is an imminent threat to the health and welfare of an individual, ODP must proceed according to the ODP incident management policy or as determined appropriate by ODP's Regional Program Manager (RPM).

SCO monitoring activities must be conducted in accordance with all federal and state statutes, including the Health Insurance Portability and Accountability Act (HIPAA) requirements. Electronic distribution of materials is permitted; if the parties involved have the means to distribute, receive and read information in electronic form, and as long as the electronic distribution of the materials is completed in a secure and protected manner in compliance with HIPAA requirements.

The SCO monitoring related documents, including process documents, the monitoring tools, FAQs and other relevant material referenced in this process may be accessed through the "Provider Monitoring" link in the provider related section of the Developmental Programs' website at: [Doing Business With ODP](#).

SCO Monitoring Phases

The three phases of the SCO monitoring cycle are: performance review, SCO reporting and ODP audit. The following chart identifies the schedule of SCO monitoring phases and associated activities. In the performance review phase, ODP makes

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performance reports available to each SCO on a quarterly basis. In the second phase, each SCO is required to complete and submit an SCO monitoring report annually to ODP. The third and final phase is the ODP audit which consists of each SCO being monitored on-site by ODP each year. The three phases of the SCO monitoring process are described in detail below.

Quarters/ Months	SCO Monitoring Phases		
	Performance Review	SCO Reporting	ODP Audit
1 st quarter July August September	Beginning July 1 – ODP makes performance reports available to each SCO. Performance explanations and CAPs, requested by ODP as applicable.	Each SCO conducts SCO reporting activities. By September 30 – Each SCO report is due to ODP.	Beginning July 1 – ODP determines the selection of individuals for on-site audits, and provides selection to each SCO prior to the on-site audit. ----- Beginning July 1 – ODP begins scheduling dates for on-site audits with each SCO. ----- Beginning July 1, 2012 – ODP analyzes results of ODP audit reports and makes revisions to process, tools, distribution methodology, etc. as appropriate and warranted.
2 nd quarter October November December	Beginning July 1 – ODP makes performance reports available to each SCO. Performance explanations and CAPs, requested by ODP as applicable.	Beginning October 1, 2012 – ODP analyzes results of SCO reports and makes revisions to process, tools, distribution methodology, etc. as appropriate and warranted.	Beginning October 1, 2011 – ODP conducts an on-site audit of each SCO.
3 rd quarter January February March	Beginning July 1 – ODP makes performance reports available to each SCO. Performance explanations and CAPs, requested by ODP as applicable.		ODP continues to conduct on-site audits.
4 th quarter April May June	Beginning July 1 – ODP makes performance reports available to each SCO. Performance explanations and CAPs, requested by ODP as applicable.		ODP continues to conduct on-site audits. By April 30 – all on-site audits must be completed. By June 30 – ODP and SCOs must finalize and approve any CAPs, if needed, no later than June 30 of each fiscal year.

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Phase 1: Performance Review

Data and trend information is made available on a quarterly basis by ODP to each SCO. The purpose of these reports is to supply SCOs with performance data that may be used by the SCO to devise strategies, while at the same time providing the SCO with an early indication of performance below statewide benchmarks. ODP will follow up with SCOs on the performance review data as needed. When a new SCO enrolls, meets qualification standards and begins providing supports coordination services, ODP will provide the new SCO with performance review reports as the data becomes available during subsequent quarter performance review phases.

Performance Review Implementation

The performance review phase will be implemented as follows:

- On a quarterly basis, ODP announces through its ODP listserv list that the report is ready to be requested in HCSIS. To register for the ODP SCO Group listserv, please access DPW's listserv website at: <http://listserv.dpw.state.pa.us>
- Each SCO requests the performance review reports through the HCSIS reporting screen. Once requested, the reports are generated through an overnight process and are accessed through the SCO's HCSIS report inbox.
- Each SCO reviews and analyzes the performance review report and takes appropriate steps to improve its performance based on the results of the analysis.
- When an SCO's performance reflects a significant divergence from statewide established benchmarks, the SCO should use this information to assist with developing improvement strategies targeting specific issues. ODP may require the SCO to respond with an explanation for the divergence, and if necessary, develop a Corrective Action Plan (CAP).
- ODP may monitor the SCO at any time it determines necessary to ensure implementation of a CAP.
- The SCO should request technical assistance or training as needed from ODP, and as identified by ODP to comply with the SCO's CAP.

The flow chart below depicts the implementation of the performance review phase:

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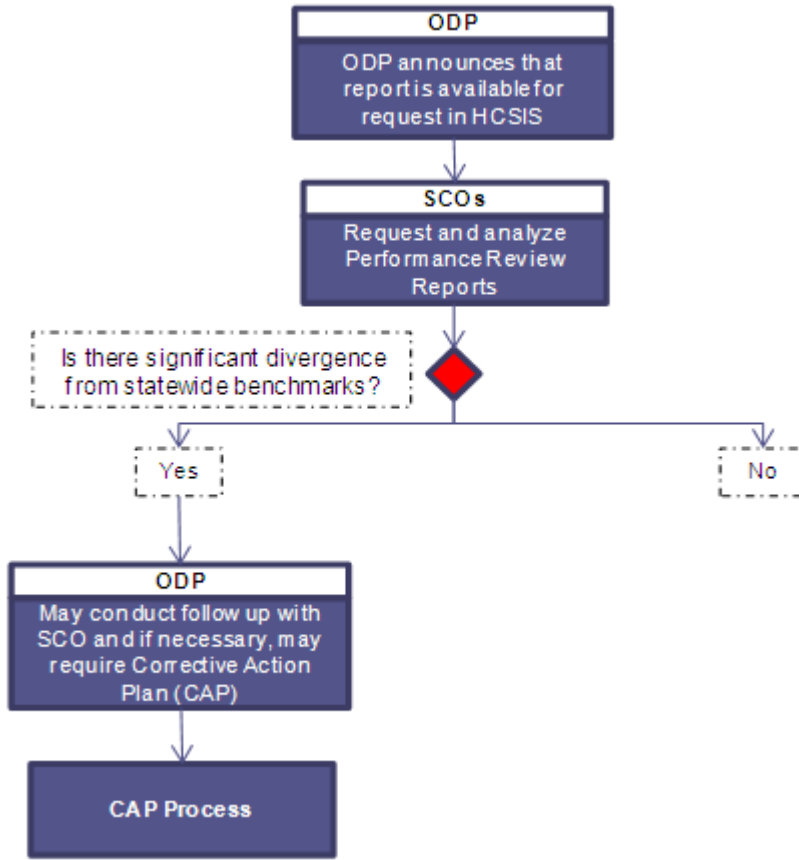


Fig. 1: Performance Review Phase Flow

Phase 2: SCO Reporting

SCO reporting is the SCO's assessment of its structure and practices that enable the SCO to meet federal regulations, waiver requirements, Provider Agreement conditions and policies and procedures. The review conducted by the SCO during this phase assists the SCO with assessing its compliance level and preparedness for the next phase of monitoring—the ODP audit. At the same time, the results from the SCO reporting phase based on responses to the monitoring tool measures provides ODP with a baseline of SCO compliance and the ability to track and trend the results statewide.

Each SCO shall conduct its annual SCO reporting by completing the standardized SCO monitoring tool. A new SCO is not required to complete an SCO report until after its first inclusion in the ODP audit phase when ODP conducts on-site monitoring of the new SCO.

SCO Reporting Implementation

The SCO reporting phase shall be implemented as follows:

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- On July 1, 2011 and annually thereafter, ODP announces that the SCO monitoring tool is available for completion and submission by each SCO.
- Each SCO must conduct its review using the SCO monitoring tool and submit its completed SCO report electronically to ODP by no later than September 30, 2011 and annually thereafter.
- ODP shall review the submitted SCO reports for timeliness and completion.
- ODP may review the content of the submitted SCO reports as it determines necessary, and will use this report as a supplement to the other documents that it will review during the SCO Audit phase. Any discrepancies identified between the findings of the audit and the SCO's report should be addressed during the audit.

Although ODP is reviewing the submitted SCO reports for timeliness and completion, each SCO must be prepared to validate the information submitted in the SCO report during the ODP audit phase of SCO monitoring. Documentation that can be used to support the information submitted in the SCO monitoring tool shall be retained by the SCO. The inability to produce such documentation when requested during an on-site audit conducted by ODP during the ODP audit phase may be treated as non-compliance and ODP may seek enforcement measures accordingly.

The flow chart below depicts the implementation of the SCO reporting phase:

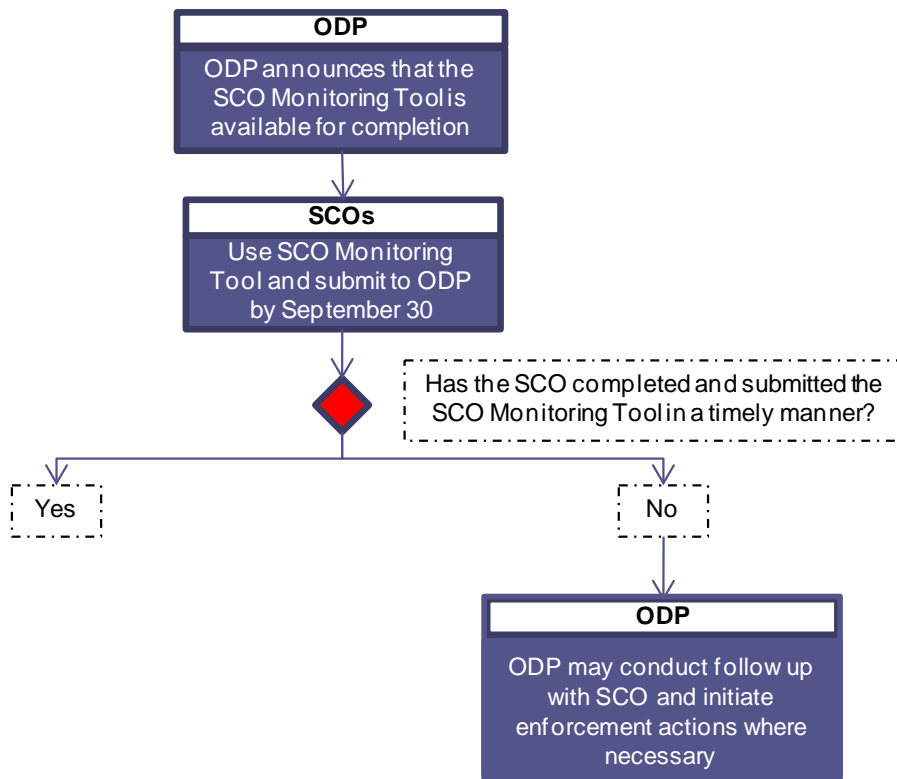


Fig 2: SCO Reporting Phase Flow

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Phase 3: ODP Audit

ODP shall conduct an annual ODP audit of each SCO beginning Fiscal Year (FY) 2011-2012 (11-12) using ODP's approved standardized SCO monitoring tool. The questions on the SCO monitoring tool are the same as the questions on the monitoring tool used by SCOs during the SCO reporting phase. The SCO monitoring conducted in FY 11-12 is referred to as the initial ODP audit for purposes of the identification of process timelines.

ODP Audit Implementation

The ODP audit phase is implemented as follows:

- ODP notifies the SCO in writing of the start date of the ODP audit. ODP begins the audits in October of each year.
- ODP conducts the audit using ODP's standardized SCO monitoring tool and guidelines.
- After the on-site audit, ODP will develop and submit a final audit report.
 - The final audit report summarizes the monitoring findings, including information received from other regional ODP offices, if applicable.
 - The final audit report must also include a review of the SCO's performance review reports for the past four quarters (if available) and any conclusions or findings noted from this review.
 - Any discrepancies between the SCO's attestations in the SCO report and the findings of the ODP audit must also be addressed in the final audit report.
- ODP completes the monitoring by April 30th of each fiscal year and submits the final audit report with the results of the on-site monitoring to each SCO prior to May 30 of each fiscal year.
- ODP provides the SCO with the option for an exit conference, where preliminary findings can be shared, or when the ODP final audit report can be reviewed and discussed with ODP. The SCO is required to respond to the final audit report within 15 calendar days upon receipt.
- If a CAP is required, it must be submitted to ODP in accordance with ODP guidelines or written policies. If a CAP is not required the SCO shall acknowledge its receipt and acceptance of the final audit report to ODP.
- ODP and SCOs finalize and approve any CAPs, as needed, no later than June 30 of each fiscal year.

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The flow chart below depicts the implementation of the ODP audit phase:

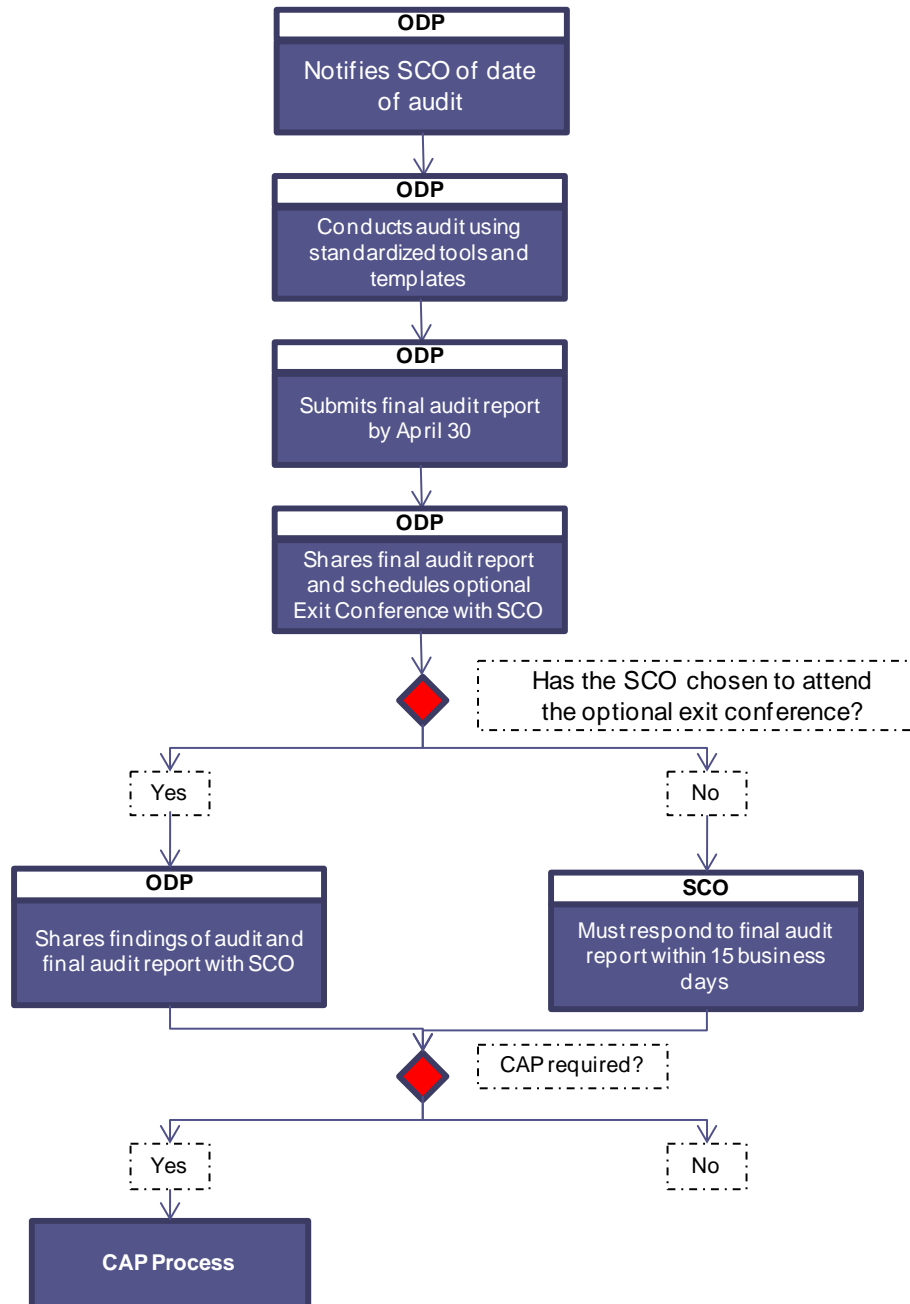


Fig 3: AE Audit Phase Flow

Unscheduled On-site Monitoring:

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ODP may conduct unscheduled on-site monitoring. If such monitoring reveals that there is a clear and imminent threat to the health and welfare of an individual, ODP shall direct immediate corrective action.

ODP is not required to complete the full SCO monitoring tool when conducting an unscheduled on-site monitoring. ODP may choose what portions of the tool are applicable.

Following an unscheduled on-site monitoring visit, ODP shall:

- Submit an unscheduled on-site monitoring report to the SCO for review.
 - The SCO is required to respond to the unscheduled on-site monitoring report within 15 calendar days upon receipt.
- Require an appropriate response or action from the SCO such as a CAP or implementation of a Directed Corrective Action Plan (DCAP), in accordance with ODP guidelines or written policies.
 - If the SCO disputes the unscheduled on-site monitoring report, the SCO shall provide a dispute/response to ODP within 15 calendar days.
- Provide technical assistance and training to SCOs as requested and as determined necessary by ODP to support all SCO monitoring activities. ODP may conduct a follow up unscheduled on-site monitoring visit at its discretion.

Follow-up Status:

ODP places an SCO in follow-up status when an SCO fails to submit an acceptable CAP or implement a DCAP or fails to meet required timelines. Under follow-up status, ODP may require additional actions from the SCO, including but not limited to:

- Attendance and participation in enhanced training and technical assistance.
- Implementation of a DCAP.

In addition, ODP may implement the following activities:

- Review of the SCO's qualifications.
- Restriction of the SCO to deliver supports coordination services to newly enrolled waiver participants.

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