This Frequently Asked Questions (FAQ) document is a living document that contains questions and answers most commonly heard from those performing the ODP SCO Monitoring process. If you have a question that is not addressed, please forward to RA-odpscomonitoring@pa.gov.

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General/ Process Related Questions

1. What is SCO Monitoring?

- SCO monitoring is a process developed by the Office of Developmental Programs (ODP) to ensure that each SCO organization is providing services in a manner that aligns with the compliance measures set forth in the Waivers, policies and procedures.

- This process was developed by ODP to support the Assurances made to CMS to develop and implement a statewide monitoring process of all Providers and SCOs.

- SCO Monitoring consists of three basic phases: Performance Review, Self-Reporting and On-site Audits.

2. Why is this process being implemented?

- The statewide SCO Monitoring process was developed to support the Assurances ODP made to CMS. The Assurances state the following:

  o The state will demonstrate that it has designed and implemented an adequate system of assuring that all Waiver services are provided by qualified Providers.
  o The Medicaid agency retains ultimate administrative authority and responsibility for the operation of the Waiver program by exercising oversight of the performance of Waiver functions by other state and local/regional non-state agencies and contracted entities.

- ODP must monitor its Providers and SCOs to ensure each organization meets the conditions of the legal agreements set forth by ODP.

- The statewide implementation of the SCO Monitoring process will allow ODP to ensure that all Providers and SCOs adhere to important policies and procedures to ensure high quality of care for each waiver participant enrolled in the program.

3. Who will be monitored and by whom?

- SCOs monitor themselves in the Self-Reporting phase. In this phase, SCOs use a monitoring survey tool to record their assessment of their own compliance level across a variety of measures.

- SCOs are monitored by ODP in the On-site Audit phase. In this phase, ODP conducts a validation of the self-assessment performed by the SCO. ODP uses the same tool during the On-site Audit that was used by the SCO in the Self-Reporting Phase.

4. If an SCO wants to change their primary contact person, what is the procedure?

- The current primary contact person must send an email to the dedicated SCO Monitoring mailbox requesting the change. The address of the dedicated mailbox is: RA-odpscomonitoring@pa.gov. If the current primary contact person is no longer employed by the SCO, the request must come from the Executive Director/CEO of the SCO. This will be confirmed with the ODP Regional Leads before the change is made.

5. **In the first year, ODP is conducting the on-site audits. In the future, will AEs conduct the on-site audits, or will ODP continue to conduct them?**

▪ ODP will conduct the on-site audits for the first year. In the future, the process may change after ODP reviews the results and progress of the process.

6. **Why are SCOs being monitored annually if providers are monitored only bi-annually?**

▪ There are two reasons for the different monitoring schedules between providers and SCOs. First, SCOs perform a critical function for waiver participants. CMS technical advisors confirmed for ODP the need for an annual review of SCOs. Second, there are approximately 700 providers actively providing services. Considering the available resources and current workload of AEs and ODP staff, ODP decided to place providers on a different schedule from SCOs. Note, however, that providers are expected to self-report on an annual basis just like SCOs.

7. **How long will the self-reporting process take me to complete?**

▪ Currently, there is no estimate for the man-hours required to complete the self-reporting tool. During the Pilot Process conducted by ODP prior to establishing the SCO Monitoring Process, the time to complete the self-assessment varied among SCOs. The most important factor in determining the amount of time taken to complete the tool was SCO preparation. The SCOs that were most aware of the content of the Bulletins, most aware of their responsibilities and requirements, and most organized in their approach to providing services took the least amount of time to complete the tool.

8. **Will there be any changes made to the Qualification process for SCOs based on the data collected through the Monitoring process?**

▪ No, there will be no changes to the Qualification process as a result of this new Monitoring process. The purpose of the Monitoring process is to validate the assertions and attestations made as part of the qualification process, and review the implementation of SCO requirements.

Performance Review Reports Related Questions

9. What is the purpose of the performance review reports?

- The purpose of the performance review report is to assist the SCO to identify areas where they are performing on target or exceeding the benchmarks set forth by ODP, as well as those areas where they may need to focus efforts for remediation and improvement.

- The performance reports will be updated quarterly and can be requested by SCOs through the reporting screens in HCSIS.

10. How do the performance review reports help us as an SCO?

- The performance review reports are primarily a management tool for the SCOs. They supply SCOs with individual performance data that may be used by the SCOs to develop improvement plans. They also give the SCOs an indication as to how they are performing on important compliance areas compared to their peers across the state. This early indication allows SCOs to make any necessary updates to their processes and policies prior to on-site monitoring, and helps them avoid Corrective Action Plans in the future.

- The reports also provide the SCO with data from past quarters, which gives the SCO a historical perspective of their performance. This allows SCOs to view the trends in their performance and investigate negative trends.

11. Is the overall monitoring process geared towards better management or compliance?

- The performance review phase is geared towards better management, while the questions in the self-reporting tool tie directly to compliance of SCO qualifications and CMS performance requirements.

12. How will ODP use the report data?

- ODP will review the data in these reports and may contact the SCO to discuss remediation efforts if there are areas identified for improvement.

- At the end of the monitoring cycle, ODP will incorporate their findings into the Final Audit Report based on the Performance Review reports.

13. In which cases will ODP conduct follow-up with the SCO based on the data on the Performance Review Reports?

- ODP may follow-up with the SCO when performance data reflects a significant divergence from state-wide benchmarks.

14. If the Performance Reports are not considered "compliance reports", why is follow-up conducted on them and why would Corrective Actions need to be taken based on them?

- The performance review reports are intended to assist the SCOs with self-assessment. ODP will also review the same reports and may follow-up and implement a Corrective Action Plan if the SCO falls below the benchmarks or shows a negative trend in terms of its performance.

- At the conclusion of the on-site audit, ODP will also provide any findings in the final audit report.

15. Why are some counties unable to view records for waiver participants who are registered in their county, but supported by a new SCO?

- HCSIS currently recognizes Counties/SCOs that were populated during system development. The system does not recognize new SCOs associated with the County/AE. ODP is working to identify how to expand HCSIS reports to include new SCOs within a county or county/joinder.

16. Are SCOs required to complete a monitoring form for base funded services?

- Yes, SCs are required to monitor individual with base funding annually. The SC may document this monitoring using the HCSIS monitoring form and/or by documenting the monitoring in SC (Service) Notes.

- There is no metric report for base monitorings. The Monitoring Metric Report does not include any information related to base monitorings.

17. How are quarters defined in the performance review report?

- The quarters in this report are Fiscal Calendar:
    - Quarter 1:   July - September
    - Quarter 2:   October - December
    - Quarter 3:   January - March
    - Quarter 4:   April - June

Service Plan Metrics: ISPs Approved

18. Which date does ODP use to measure when the SCO submits the plan to the AE? Some plans are cross-over plans because they cross over the fiscal year, so how are these dealt with?

- This metric looks at the date when the ISP status changed to "Pending Approval" and measures that against the "Annual Review Update" date. The status is changed to "Pending Approval" when an ISP is submitted for review. The "Pending Approval" date should be at the benchmark of 30 or more days prior to the annual review update date.

- Cross-over plans, also known as Fiscal Year Renewal plans, are not annual plans so they are not measured. Please note that this metric looks only at Annual plans, not at those requiring critical revisions. The metrics report does not capture data for fiscal year plans. You can check the status of the ISPs on the history report associated with the ISP.

19. Is the fiscal year renewal process included in the metric that calculates the number of plans returned?

- No, this metric only considers annual review plans, not plans from the fiscal year renewal process.

20. Can the benchmark be reconsidered for the plans returned at 10%? The benchmark seems too low, as there have been instances where even hundreds of plans are returned due to misunderstandings over plans.

- The benchmark will remain at its current level. The intent of the report is to make SCOs aware of changes and trends in their performance and provide a frame of reference against which to track their performance. The report provides SCOs with relevant information to help manage their organization. In the example above, the Performance Review Report would show the spike in the returned plans; however, the SCO involved would already be aware of the situation and know the reason for this spike.

21. Within some SCOs, the history screens for the waiver participants they serve are not viewable. Is ODP able to pull data related to when the ISP was submitted to the AE for such individuals?

- Yes, ODP is able to pull data related to the ISP. A Program Change Request (PCR) for the system has been created regarding the history screen.

SCO Monitoring Metrics: Do SCs complete the SC monitoring as per ODP's requirements?

22. With respect to the number of SC monitorings conducted, how is compliance measured for newly enrolled waiver participants? For example, if a waiver participant is newly enrolled in the waiver program in February; does the metric require only 2 monitorings for the quarter?

- A waiver participant who has not been enrolled for all 3 months of the quarter is not reflected in this metric. The waiver participant in this example would not be counted and therefore would not affect the overall compliance of the SCO for that quarter. However, if the above waiver participant was enrolled for all 3 months of the April-June quarter, he/she would be counted in the data for that quarter.

23. The compliance requirement in the waiver is to conduct 3 monitorings per quarter. Is the metric calculating compliance for this metric on a monthly basis or on a 3 per quarter basis?

- The metric measures compliance as 3 monitorings per quarter, and does not break it down by month.

Service Delivery Metrics: Claims Management

24. Why are we using 14 calendar days instead of 14 working days when calculating claims management issues?

▪ 14 calendar days are being used rather than 14 working days because the SC Services Bulletin identifies the timeframe for entering the monitoring report into HCSIS as 14 calendar days.

Self-Reporting Related Questions

25. How do I access the self-reporting tool?

▪ A unique, SCO-specific link to the tool will be emailed to the identified primary SCO monitoring contact at the beginning of the Self-Reporting phase. This is the preferred manner for accessing and completing the self-reporting tool.

   o When SCOs access the tool via this unique link provided in the e-mail, they will be able to save partially completed work and return to complete the tool at a later date if desired.

▪ A less preferred method of accessing the link is also available on the Supports Coordination Organization Information Center (SCOIC).

   o If the SCO chooses to complete the tool via the link posted on the SCOIC, the tool must be completed in one sitting. The survey will not be bookmarked and entries will be lost.

26. Will the Zoomerang survey tool time-out while information is being entered? Will the Zoomerang link "expire" if it not accessed within a certain period of time?

▪ No, the link neither "times-out" nor "expires" with inactivity. However, ODP has established September 30th, 2011 as the deadline by which the tool must be submitted by SCOs. Once this deadline has passed, the survey will be closed and the SCO will no longer have access.

27. The training states that the sample will include 10 MCI numbers in the primary sample plus 5 additional MCI numbers. When would the 5 additional MCIs be used? Is there a date after which waiver participants who are no longer receiving services should be excluded and an alternate used instead?

▪ Alternates would be used in place of any waiver participant in the primary sample no longer receiving SC services from the SCO. There is no specific cut-off date after which waiver participants, no longer receiving services, should be excluded. If the waiver participant is registered with the SCO on the day the SCO starts working on the self-reporting tool, the waiver participant's record must be part of the sample used by the SCO. But if the waiver participant stopped receiving services after the sample was pulled the SCO would not have access to the record.

▪ Note that the record must be available to the SCO in order to be included in the monitoring. If a waiver participant is not registered with the SCO on the day the tool is being completed, the SCO will not have access to his/her records and will therefore be unable to use the waiver participant's record to respond

to the questions on the tool. In this scenario the SCO is required to choose the first MCI number on the list of 5 alternate MCI numbers provided.

28. Under Section V: Record Review questions, which 6 month period should the SCO use while reviewing the records and completing these questions?

- The SCO should use 6 months prior to the date they started using the monitoring tool. SCOs need to clearly document the 6-month period being used, including the beginning date and the end date. This allows ODP to reconcile their findings with the self-report when completing an audit.

29. Question 14: Is the satisfaction survey required to be distributed to every individual, or only to the individuals in sample?

- The survey sample is only a subset of all waiver participants served by the SCO. The SC Services Bulletin (page 6) clearly identifies the methodology to be followed while distributing the satisfaction survey.

  - The requirement is for SCOs to distribute the Survey to at least 30 percent of the Waiver participants the SCO serves during that survey period. If 30 percent does not yield 50 participants the SCO is required to identify additional participants until a minimum of 50 participants are identified. If the SCO does not provide services to at least 50 participants, the SCO is required to distribute the Survey to all the Waiver participants it serves during the survey period.

- SCOs are required to review and be familiar with all bulletins related to SCO activities and responsibilities. The SC Services Bulletin contains further information on the distribution of the survey. Please review the Bulletin for additional information

30. Question 16: Does the written protocol need to reference a particular document or tool?

- Yes, the SC Services Bulletin identifies the written internal protocols related to the SIS that must be followed by the SCO.

31. Question 17: How do I respond to this question if the documents were not requested prior to September 30th, which is when the self-reporting is due?

- Respond to this question based on whether or not you have the documents ready to submit if ODP were to request them.

32. Question 23: What specific documentation is needed to validate the SCO requirement of maintaining an updated listing of drivers' licenses, certifications, and qualifications?

- "Licenses, certifications and qualifications" is the language used in the Waiver. Specifically, this documentation requirement refers to the drivers' licenses, since there is no required certification for SCs. Documents related to qualifications are those that were used to determine if the SC was eligible to work. The SCO is required to maintain documentation that supports their qualifications.

33. **Question 30: Can you identify the questions in the customer satisfaction survey that relate to waiver compliance? This way, we would be able to identify areas of waiver non-compliance and draft corrective action plans accordingly?**

- The following questions do not directly relate to waiver/SC requirements: Questions 9, 11, 14, 169, 20, 24, 25, 26, and 27.

- All other questions relate to the waiver, and non-compliances related to those questions could require corrective action plans.

34. **Question 34: How should we answer this question concerning the name of the SCO employee designated as the point person for claims management issues? Every SC in our organization currently handles their own claims issues for their specific waiver participants.**

- The SC Services Bulletin states that there must be a person designated as the staff member to serve as the point of contact for waiver service provider claims issues. This is in relation to the completion, update, or correction of information in the ISP.

- The SCO may handle claims management issues as it sees fit as long as the above requirement is filled and a capable point person is identified.

35. **Question 40: Are we still required to submit a semi-annual report if our SCO has had no incidents related to Supports Coordination? What type of information would the semi-annual report contain if we have no incidents?**

- Yes, you are still required to submit a semi-annual report every 6 months, according to the Incident Management bulletin. The frequency of incidents with SC services may be low, but the Incident Management Bulletin still requires the report to be submitted. Your report would state that you had no incidents during this period.

36. **Question 46: What is considered acceptable curriculum and records to be submitted? If curriculum was not provided and only an agenda is on record, what should we submit?**

- The Qualification document (Question 29) discusses what is considered acceptable training. Documentation that demonstrates that the training requirement was met can be used for this question. Please note the SCO does not need to maintain multiple copies of training materials for multiple SC attendees at a specific training. One set of training materials for a specific training will meet the documentation requirement.

37. **Question 55: What year should I use for the IM4Q considerations? Do I use the 10/11 cycle or the 09/10 cycle?**

- Use the last completed IM4Q year considerations. For Fiscal Year 11/12 SCO monitoring, use IM4Q considerations from Fiscal Year 10/11.

38. **Question 56: Is it necessary to maintain the information in the service notes, on the ISP, and on the ISP signature page? Is it sufficient for the information to be present in one of the three places?**

- Yes, it is necessary to maintain the information in the service notes, on the ISP, and on the ISP signature page. ODP policy requires the information to be maintained in all three locations.

Provider Licensing Summaries

39. **Question 36: Why would an SCO be responsible for checking on provider licensing summary information?**

- When a provider is licensed, the provider might have been issued with non-compliances related to those licenses. SCs should be aware of these issues related to a provider's licenses, since they are responsible for monitoring a waiver participant's service. The SC must be aware of any issues, in order to ensure the safety and quality of the service provided by the provider. This requirement to share licensing information with SCs is a long-standing requirement.

40. **Question 36: In order to answer "yes" to this question, how often do we need to check the licensing summaries and share this information with the SCs?**

- There is no specific frequency that ODP recommends. The SCO is responsible for reviewing the licensing summaries for providers who support waiver participants receiving waiver services. In order to answer 'yes' to this question, the SCO must be able to demonstrate that they have a process for sharing licensing related information with SCs if there may be a risk to the health and welfare of waiver participants. Licensing is completed annually for providers.

41. **Question 36: Is there a schedule of licensing available that we can use to answer this question?**

- A schedule of license expiration dates is not currently available. However, each provider license indicates the effective dates of their license.

Customer Satisfaction Survey

42. **If we conduct the survey every year rather than every 2 years and we issue the survey to everyone instead of the recommended sample, can we still answer "yes" to the questions related to the survey?**

- Yes, since you are exceeding the requirements, you are also meeting the requirements.

43. How do we answer questions related to the Customer Satisfaction Survey, since the survey was completed by the AE instead of by us? The responsibility of performing these surveys shifted from the AE to us (the SCO) only recently.

- Answer this question on whether the activity performed was completed or not. You may use the comment box to explain your unique circumstance in greater detail.

On-site Audit Related Questions

44. What is an on-site audit?

- The on-site audit is when ODP visits the SCO to validate the information reported during the self-reporting phase.

45. How often will SCOs be audited?

- All SCOs will be audited annually by ODP.