

TCM/1915(i) Annual Site Visit/Monitoring Process

Prior to the site visit:

When scheduling the in-person annual site visit with the Care Coordination Organization (CCO), the CSA/LBHA may request that information to complete Section 1 - Policies and Procedures (P&P), Section 2 - Personnel Records, and Section 3 - Maryland YCC Training Series of the Statewide Monitoring Visit Tool be sent for review and/or completed by the CCO ahead of the site visit. This can allow more time to review charts during the site visit. Additionally, a list of enrolled youth during the time period under review should be requested by the CSA/LBHA and sent by the CCO up to 5 days ahead of the site visit. The CSA/LBHA shall send a copy of the chart review sections of the tool, Sections 5 - Chart Review (All Levels) and Section 6 - Chart Review (1915i), to the CCO prior to the site visit.

At the site visit:

During the entrance interview, the CSA/LBHA will go over the monitoring process and share any other relevant information. The CSA/LBHA must review charts from all three levels of care, including 1915i and discharged charts when applicable. **A defensible sample for chart review includes 20% of the new youth enrolled during the time period under review, with a minimum of 10 charts being reviewed if 20% will be less than 10 charts.** Additionally, at least 5% of the sample must include discharged charts, when applicable, with a **minimum of 1 discharged chart** being reviewed. The CSA/LBHA will select charts from the list and will notify the CCO regarding which charts were selected for review. The CCO will provide access to all records for the selected sample.

One column of Section 5 will be completed for each chart reviewed. 1915i charts will be reviewed using one column in both Section 5 and Section 6 of the tool. After all selected charts are reviewed, the CSA/LBHA will compile the information from each reviewer and compute compliance for each monitored item using the **compliance percentage equation: (# Charts in Compliance / Total # of Charts Reviewed) x 100 = Compliance Percentage**

Compliance percentage equation example:

Updates to the POC occur within 5 calendar days of the CFT meeting 10.09.90.13(C)	Yes X No ☐ N/A ☐	Yes X No ☐ N/A ☐	Yes X No ☐ N/A ☐	Yes ☐ No X N/A ☐	Yes X No ☐ N/A ☐	Yes ☐ No X N/A ☐
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*Monitored Item: POC updated within 5 calendar days of the CFT. Four charts were compliant and six charts total were reviewed. The compliance percentage would be computed as follows:
 $(4 / 6) \times 100 = .6666666667 \times 100 = 67\%$.*

A Corrective Action Plan (CAP) will be required for any monitored item receiving a score below 75% compliance of a defensible sample from Section 5 of the tool and for any item receiving a score below 95% compliance of a defensible sample from Section 6 of the tool. Additionally, the CSA/LBHA shall issue a Program Improvement Plan (PIP)

to highlight any programmatic recommendations, including expected implementation timelines, suggested by the CSA/LBHA to improve areas of concern that may be affecting service delivery and require additional training and/or technical assistance to address.

During a brief exit interview, the CSA/LBHA will share preliminary feedback. The CSA/LBHA will make the CCO aware that a letter of findings will be sent with the complete results of the monitoring, including any CAP items or PIP areas, when applicable.

After the site visit:

Within 14 calendar days after the site visit, the CSA/LBHA will send the Letter of Findings to the CCO, with a cc:BHA (joann.baxley1@maryland.gov), indicating the results of the site monitoring visit. The letter of findings must include the following:

- date of the visit
- number of youth enrolled during the time period under review
- number of staff
- number of complaints/grievances reported to the CCO and/or CSA/LBHA and outcomes
- number of reportable events submitted to CSA/LBHA and/or BHA
- total number of charts reviewed including number of 1915i charts and number of discharged charts reviewed (when applicable)
- a statement that identifies one of the following outcomes:
 - provider has met compliance standards of COMAR 10.09.89 and 10.09.90
 - provider has met compliance standards of COMAR 10.09.89 and 10.09.90 and PIP recommendations, including expected implementation timelines, are listed to address identified area(s) of concern
 - provider has not met compliance standards of COMAR 10.09.89 and 10.09.90 and a CAP is required for the identified monitored item(s)
- signature(s)

A follow up letter of findings must include the following:

- ❖ date of the follow up visit
- ❖ total number of charts reviewed
- ❖ a statement that identifies one of the following outcomes:
 - CAP is being implemented satisfactorily (provider has demonstrated COMAR compliance in the identified monitored items of the CAP)
 - CAP is not being implemented satisfactorily (provider has not demonstrated COMAR compliance in the identified monitored items of the CAP)
- ❖ signature(s)

If there is no CAP required [which includes instances where PIP recommendations are listed] BHA will issue a Certificate of Approval with a 1 year duration from the date of

completion of the site visit to the CCO supervisor on file after it is signed by the CSA/LBHA.

If a CAP is required, BHA will issue a Provisional Certificate of Approval with a 90 day duration from the date of completion of the site visit to the CCO supervisor on file after it is signed by the CSA/LBHA. Per the standards described above, those items requiring a CAP must be included in the letter of findings with the appropriate timeframes for the CAP to be completed. The CCO must submit the CAP to the CSA/LBHA within 14 calendar days from the date of the letter. The CSA/LBHA has 14 calendar days, from the date on the CAP, to accept or reject it. If a CAP is rejected, the CSA/LBHA must, in writing with a cc:BHA, indicate which portions of the CAP are not being accepted and allow 14 calendar days for the CCO to resubmit the CAP.

When the CAP is accepted, the CSA/LBHA will notify the CCO and BHA. In addition, the CSA/LBHA will send a copy of the CAP to BHA. Within the timeframe remaining in the Provisional Certificate of Approval, the CSA/LBHA will complete a follow up site visit to ensure that the corrective action(s) are being implemented. At the discretion of the CSA/LBHA the follow up visit may be conducted virtually based on the CCOs capability of remote EMR review. The CSA/LBHA may invite BHA to the follow up site visit and/or will report follow up findings back to BHA within 14 calendar days of the follow up visit. If the CSA/LBHA's follow up letter of findings show that the CAP is being implemented satisfactorily, BHA will issue a Certificate of Approval with a 1 year duration from the date of completion of the follow up site visit and send to the CCO supervisor on file after it is signed by the CSA/LBHA.

If the CSA/LBHA's follow up findings show that the CAP is not being implemented satisfactorily, BHA will issue a second Provisional Certificate of Approval with a 90 day duration from the date of completion of the follow up site visit to the CCO supervisor on file after it is signed by the CSA/LBHA. Within the timeframe remaining in the second Provisional Certificate of Approval, the CSA/LBHA will complete another follow up site visit to ensure that the CAP is being implemented. If the CSA/LBHA's follow up findings now show that the CAP is being implemented satisfactorily, BHA will issue a Certificate of Approval with the remainder of the 1 year duration from the date of the initial site visit and send to the CCO supervisor on file after it is signed by the CSA/LBHA.

If the CSA/LBHA's follow up findings still show that the CAP is not being implemented satisfactorily, BHA will not issue an additional Certificate of Approval*. The CSA/LBHA will require a consultation with BHA to determine next steps which will include the CSA/LBHA working collaboratively with BHA in developing an [180 day] Administrative Follow Up Plan that is directive in nature and outlines specific deliverables the CCO must complete to come into compliance, this may include the CSA/LBHA/BHA providing on site support and/or TA, more frequent and/or additional data reporting requirements, and/or linkages to additional resources. During an Administrative Follow Up Plan meeting the CSA/LBHA and BHA will review the Administrative Follow Up Plan with the CCO; implementation of the Plan will be required immediately upon review. The CCO must submit the signed Plan to the

CSA/LBHA within 7 calendar days from the date of the meeting and the CSA/LBHA must submit the signed Plan to BHA within 7 calendar days of receipt.

During the timeframe remaining in the annual monitoring period, the CSA/LBHA will monitor the specific deliverables outlined in the Administrative Follow Up Plan for compliance. During the subsequent in-person annual site visit, the CSA/LBHA should denote/flag the previously unmet COMAR regulations for which the Administrative Follow Up Plan was being implemented in order to gauge satisfactory implementation, which shall be reflected in the body of the letter of findings, where applicable.

**Please note that although the CCO will not have an active Certificate of Approval during the period in which they are under an administrative follow up plan, the Certificate of Approval, or lack thereof, does not authorize or prohibit the CCO from providing the services outlined in their contract. The Certificate of Approval process primarily functions as a COMAR compliance tracking mechanism for BHA.*