

PRSN Subcontractor Delegation & Assessment Tool- Regional IS

The Peninsula Regional Support Network (PRSN) is accountable for any functions and responsibilities that it delegates through a subcontract. The PRSN conducts a subcontractor delegation review of current subcontractors to assess satisfactorily performance of contracted PRSN/PIHP functions. This tool will be used in conjunction with the External Quality Review Organizations (EQRO) annual findings, as they relate to the contracted regional IS functions.

Delegated Contractor: Kitsap Mental Health Services Date: December 20, 2007

Delegated PIHP functions: Information Services

Audit Instructions

The tool can be completed through a combination of the following activities:

- Interview of delegated organization's staff.
- Review of delegated organization's policies and procedures as well as other documentation.
- On-site review of delegated organization's facility.

Scoring Range: 1= absent, 2= partially developed, 3= evidence of compliance

#	ITEM	SCORE	PRSN COMMENTS
1. Organizational capacity to perform subdelegated functions			
a	Maintain compliance with regional IS policies and procedures covering the adherence to contract and relevant regulations As evidenced by - Review of P&P for contract/ regulation requirements for completeness and how they are internally monitored (including data security and disaster recovery requirements).	3	As evidenced by KMHS index to current P&P for IS (refer to ISDOCS/PROJECTS cdata07 and cordat). These P&Ps have been sent to network providers. PRSN manual chapter 4 contains regional IS P&Ps. New system: P&Ps for Profiler system will be developed and distributed at implementation in CY 2008.
Manage all aspects of the PRSN IS system to report and ensure:			
b	<ul style="list-style-type: none"> ▪ Recording of data on service authorizations As evidenced by – Review of data reports	3	UM data reports are prepared by UM contractor, CommCare. Service authorization information is available on CMHAs database managed by KMHS, and monthly statistical reports can be compiled by either source. New system: Profiler is being developed with ability to generate customized UM reports, as needed, at PRSN.

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c	<ul style="list-style-type: none"> ▪ Recording of Voluntary inpatient certifications As evidenced by – Review of data reports	NA	<p>The PRSN UM subcontractor, CommCare, is responsible for voluntary inpatient certifications and reports outlining same.</p> <p>New system: Actual authorizations for outpatient, inpatient, and residential will reside in system.</p>
d	<ul style="list-style-type: none"> ▪ Provision of data for PRSN quality management needs As evidenced by – Review of data reports	3	<p>Numerous reports provided to identify UM (over and under), timeliness of authorization renewals, discharge and services, timelines for first contacts (request, appointment, outpatient assignment), data integrity information, ect.</p> <p>As evidenced by attachment Dictionary Print RSN / Report.</p>
e	<ul style="list-style-type: none"> ▪ Daily back-up and tape storage for all sites As evidenced by- Review of back-up storage process	3	<p>As evidenced by procedure in IS/DCOS/PRSN/EQRO/2007 July review.</p>
f	<ul style="list-style-type: none"> ▪ Manage and control system security set-up for each provider As evidenced by – Review of the security and system disaster recovery process	3	<p>All granted access must have formal request and oath signed- maintained on file at KMHS IS office. Security access is granted according to role base.</p>
g	<ul style="list-style-type: none"> ▪ Set up and maintain the necessary items to allow the state core data to be entered into system As evidenced by - Review encounter data and data error reports	3	<p>As evidenced by attachment MHD Weekly Status Report dated 12/17/07.</p>
h	<ul style="list-style-type: none"> ▪ Management and submission compliance as stated in the contract between the PRSN/ KC and the MHD As evidenced by - Verify process, including data certification process	3	<p>As evidenced by attachment MHD Weekly Status Report- emails to PRSN as notification of file delivery requires certification (process).</p>
i	<ul style="list-style-type: none"> ▪ Install and apply appropriate system software and operating system upgrades As evidenced by - Review dates of system upgrades and installations	3	<p>Only updates performed have been to Windows network (not affecting PRSN data).</p>

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j	<p>Maintaining an internal quality management/quality improvement process As evidenced by - Review of applicable documentation, such as meeting minutes, training venues, network satisfaction surveys, ect.</p>	3	<p>2006 CAP requiring a more formalized process and related documentation addressed through the development phase e of the new system. Weekly system development meetings (with documentation) began February 2007. Weekly meetings are scheduled through the implementation phase.</p> <p>KMHS staff have provided on-site training and technical support to CMHAs throughout FY 06-07.</p> <p>New system: KMHS and CMHAs formal working committee established 2/2007 meets weekly to develop details of new system. Network satisfaction addressed in development process.</p>
k	<p>Provide timely contract specific activities and reports of acceptable quality As evidenced by- Review reports or sample reports of prospective subcontractors</p>	3	<p>KMHS consistently provide a variety of requested reports form the PRSN in a timely manner. Excellent customer service.</p> <p>As evidenced by attachment Most Recent Warning and Errors Report generated by MHD.</p> <p>As evidenced by MHD Batch Error Report. PRSN/ KMHS IS rated with 0.00% error rate for November and December 2007. Highest rate for no errors in RSNs in the state, .09% total sine July 2005. See statewide error report, attachment 4</p>
l	<p>Adequate training is provided/ available to the region As evidenced by - Training logs</p>	3	<p>KMHS staff have provided on-site training and technical support to CMHAs throughout FY 06-07.</p> <p>Data dictionary updates are introduced and the system is upgraded for change, as needed.</p> <p>New system: KMHS and CMHAs formal working committee established 2/2007 meets weekly to develop details of new system. Network satisfaction addressed in development process.</p>

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m	KMHS communicate system improvement strategies to the PRSN, make recommendations for system changes/ improvement As evidenced by - Feedback provided to the PRSN	3	KMHS IT actively participates in the statewide ISDEC and PI workgroups. Also an active participant in the local software user group to monitor and influence change.
n	KMHS is responsive to problems and has established effective communication with each providers' "system manager" As evidenced by - Internal QA/ QI projects, informal and formal feedback, ect	3	KMHS consistently provide a variety of requested reports from the PRSN in a timely manner, on-site trainings, technical support, and facilitates weekly meetings for new system development. Excellent customer service.
2. Staffing Capacity			
a	The availability of qualified staff to perform delegated functions and sufficient staff to maintain regional IS CMHC system. As evidenced by - Analyze contractor ability to analyze staffing sufficiency, request annually updated staffing directory, and require PRSN notification with significant reduction/ changes to staffing patterns.	3	As evidenced by attached KMHS IS org chart (attachment 5). No significant reductions/ changes in staffing patterns noted for review period.
b	Hiring for IS staff includes background checks, federal exclusions and reference checks. As evidenced by - Review personnel files for noted documents.	Defer	Verified in annual KMHS Admin. review process.
c	Provides adequate and appropriate training and supervision to KMHS IS staff. As evidenced by - Review organizational chart and personnel/ training files		As evidenced by attached KMHS IS org chart (attachment 5).
d	Staff competence in implementing delegated functions. <ul style="list-style-type: none"> ▪ This includes reviews of service data including submission statistics from the MHD Intranet, review of error reports and timeframes of encounter data transmission, supervisory feedback to staff, and response to complaints and grievances. As evidenced by - Review applicable documentation (Intranet reports, meeting attendance, trainings provided)	3	No training deficiencies noted during review period. KMHS IT actively participates in the statewide ISDEC and PI workgroups. Also an active participant in the local software user group to monitor and address training issue/ system changes.
e	Timely communication with PRSN regarding delegated decisions; As evidenced by - Monitor responsiveness time with regards to scheduled reports, returned PRSN phone calls, and demonstrated proactive communication	3	KMHS consistently provide a variety of requested reports from the PRSN in a timely manner, on-site trainings, technical support, and facilitates weekly meetings for a new system development. Excellent customer service.

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3. HIPAA and Medicaid Compliance Reporting			
a	<p>Contractors comply with HIPAA standards.</p> <p>As evidenced by - Review agency P&P for HIPAA standards, review staff training records.</p>	3	<p>KMHS IS Director is HIPAA officer- aware of standards. AS evidenced by P&P plus accepted responses in the 2006 EQRO Appendix Z review.</p>
4. Data Security Requirements			
a	<p>Please check which of the following media is used to store and protect the regional data:</p> <p><input type="checkbox"/> Hard disk drives <input type="checkbox"/>_XX_ Network server disks</p> <p><input type="checkbox"/> Optical discs (CDs or DVDs) in local workstation optical disc drives</p> <p><input type="checkbox"/> Optical discs (CDs or DVDs) in drives or jukeboxes attached to servers</p> <p><input type="checkbox"/> Paper documents</p>		
b	<p>Storage of data on portable media or devices is given special protection, if being transported outside of an secure area, by: (which of the following)</p> <p><input type="checkbox"/> Encrypting the data and devices</p> <p><input type="checkbox"/> Controlling access to devices with a password or stronger authentication methods</p> <p><input type="checkbox"/> Manually locking devices whenever they are left unattended and setting devices to lock automatically after a period of inactivity (maximum period is 20 minutes)</p> <p><input type="checkbox"/> Physically protect portable devices an media by: keeping them locked storage when not in use, using check-in procedures, and frequent inventories</p>	3	<p>KMHS response: No portable storage allowed except backup tapes which are stored in a secure safe off-site, as required.</p> <p>As evidenced by data inventory provided.</p>
c	<p>Data segregation.</p> <p>DSHS data is segregated or otherwise distinguishable from non-DSHS data. This includes procedures for storage of data on media, in a logical container, within a shared database, and paper documents.</p> <p>As evidenced by – Review of the segregated data system</p>	3	<p>Systems (current and new) allow data to be deleted/ reclaim space used for the RSN data. They are on a single partition.</p>
d	<p>Data disposition.</p> <p>Data is destroyed in accordance with the DSHS IT Security Policy.</p> <p>As evidenced by – Review of the process</p>	Defer	<p>See above (4c). The “logical” partition cannot be destroyed without destruction of the entire system and [provider-based information.</p>

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e	Notification of Compromised or Potential Compromise. Process to notify DSHS and the PRSN within one business day if the data is compromised or potentially compromised. As evidenced by – Review of the notification process	3*	Recommendation: Verify and revise HIPAA policy to include language/ process, as needed.
f	Data shared with sub-contractors. Data security provisions, for data shared with subcontractors, are included in the contract and accompanying documents. As evidenced by – Review of applicable subcontracts	3	All subcontractors with access are required to sign the HIPAA Business Associate Agreement, Oath form and are informed of the privacy requirements.

Additional considerations:

The PRSN staff conducting the review monitored the subdelegated activities of KMHS IS using the standardized tool, as well as participated in a training demonstration of the Profiler system. Profiler, thru Unicare, is anticipated to launch January 2008 and replace the current CMHC vendor managing the region-wide database. This review was conducted as an annual evaluation of the current system and assessment of the new system.

PRSN has access to CMHC via remote connection at the PRSN office. All PRSN staff have had training and access to CMHC. Kitsap County IS has struggled with establishing connection to CMHC (via a secure VPN) to connect all PRSN staff personal computers.

All PRSN staff received hands-on overview of new system “Profiler” to be launched April 1, 2008 (March testing month) region wide.

- Reviewed data entry fields for EMR (including screening/ assessment, authorization (service plan), plan of care/ progress notes, and treatment planning), reporting capabilities, and bed space availability.
- Reviewed year-long development of new system and discussed training plan for new system implementation at the CMHAs.
- Briefly discussed loading of new system with current CMHC data fields and information that will be retained/ archived in CMHC (such as progress notes).
- Continued development: authorization process (inpatient) and DMHP documents
- Items of on-going discussion: TeleSage monitoring and ability to flag specific class members (Allen/Marr)

Conclusions:

In full compliance- exceeds error rate standards/ expectation. Excellent customer service to network.

Follow up required for the following areas:

No CAPs. One recommendation noted (4e).