



SALISH BHO

PROVIDER MONITORING POLICIES AND PROCEDURES

Policy Name: MONITORING CONTRACTOR AND
SUBCONTRACTOR SUFFICIENCY

Policy Number: 9.01

Reference: 42 CFR 438.206; 42 CFR 438.207;
State Contract

Effective Date: 8/2004

Revision Date(s): 12/2011; 4/2016

Reviewed Date: 4/2016; 6/2017; 5/2018

Approved by: SBHO Executive Board

CROSS REFERENCES

- Plan: Quality Management Plan
- Policy: Corrective Action Plans
- Policy: Monitoring of Contractors
- Policy: Provider and Subcontractor Administrative Review
- Policy: Subcontractual Delegation and Assessment Plan

PURPOSE

The Salish Behavioral Health Organization (SBHO) will monitor provider network and subcontractor sufficiency and provide reports to the state.

PROCEDURE

1. SBHO providers will complete a report detailing current staffing.
 - a. Report will be updated as per contract.
 - b. Report will detail number of network staff and areas of specialty employed by each network provider. Specialties include:
 - Credentials, such as psychiatrists, MHPs, MSWs, CDPs, etc.
 - Age, such as child and geriatric
 - Minority
 - Disability and hearing impaired
 - Evidence Based Practice training, and
 - Bilingual skills

2. SBHO subdelegated contractors will provide evidence of how previous fiscal year activities outlined in the contracts were met during the regularly scheduled Administrative Reviews.
3. SBHO staff will monitor contractor reports and delegation agreements through the following activities:
 - a. Conduct a GEOACCESS mapping, with significant alternations to population and/or public transportation routes, to ensure adequate capacity for the expected enrollment in our service area in accordance with state standards for access to care travel times, as required.
 - b. SBHO will monitor the report for losses or additions of individuals with particular specialties.
 - c. The SBHO will work with network providers to ensure continued access to specialists.
 - d. If a network provider loses internal access to a particular specialist, the SBHO will work with the provider to:
 - Encourage the hiring of replacement staff or train existing staff to meet qualifications
 - Maintain access via referrals for outside-agency contracts or arrangements with other network providers
 - e. The SBHO will conduct regularly scheduled formal reviews of contractors and subcontractors with Subdelegation Agreements, using the SBHO Subcontractual Delegation and Assessment Plan.

MONITORING

1. Policy Monitoring. The SBHO will conduct resource management of network sufficiently through:
 - Grievance Reports and system tracking of concerns and grievances to assess if there is a pattern that suggests inadequacy in network sufficiency or gaps in service capability. The reports will be reviewed by SBHO staff and the Quality Improvement Committee.
 - Regularly scheduled SBHO Provider and Subcontractor Administrative Review
 - Monthly Provider Chart Reviews
 - Reference existing GEOACCESS maps to analyze gaps in meeting state standards.
2. If a provider performs below expected standards during any of the reviews listed above a Corrective Action will be required for SBHO approval.