AUDIENCE: Administrators and staff of licensed and unlicensed providers and vendors of Consolidated and Person/Family Directed Support (P/FDS) Waiver services; Administrative Entities (AEs)

PURPOSE: This ODP communication announces a summary of the changes related to the 2016-2017 Provider Monitoring and Provider Qualification Process. ODP will post revised Provider Monitoring resource materials on the Provider Information Center (PIC) and Administrative Entity Information Center (AEIC). As a reminder, ODP will provide the link to the new training and resource platform, along with instructions on how to create an account and access trainings, resources and communications at a later date.

All administrators and staff with a role in the Provider Monitoring process should review all the resource materials so they are aware of the changes and can properly implement and complete the Provider Monitoring Process.

DISCUSSION: The ODP Provider Monitoring process utilizes standard tools and data collection documents to verify that Waiver providers are in compliance with the Consolidated and Person/Family Directed Support (P/FDS) Waivers and Federal and State regulations. Provider Monitoring also ensures that ODP policies, procedures, 55 Pa. Code Chapter 51 regulations and the current ODP Provider Agreement for Participation in Pennsylvania’s Consolidated and P/FDS Waivers are implemented as outlined.

The Provider Monitoring process is based on a two year cycle. All providers are required to complete a Self-Assessment every year and to participate in an on-site review at least once per cycle. FY 2016-2017 begins the second year of Cycle 3 of the monitoring process. To prepare for Cycle 3, Year 2, ODP has made several changes to the monitoring process based
upon review of processes and tools that were used in Cycle 3, Year 1, the 55 Pa. Code Chapter 51 regulations and changes Federal regulation requirements. In addition, changes and clarifications were made to the processes and tools based on feedback received from AEs and providers.

The Provider Qualification process requires that all providers and vendors who render Consolidated and P/FDS Waiver services must meet the qualification criteria outlined in the Waivers for each service they intend to render prior to starting services. Qualifications are completed by the service/specialty as outlined in ODP Announcement 001-16 “ODP Provider Qualification Documentation Record & Webinar”

**PROVIDER MONITORING:**

**Sampling Methodology:**

All providers who were qualified the previous Fiscal Year (2015/2016) will be included in the Provider Monitoring process, whether or not they had any service authorizations during that Fiscal Year. For providers without service authorizations, only the administrative sections that do not relate to the individual sample of the applicable Monitoring Tool will need to be completed. Please refer to the applicable Guidelines to determine which sections are required to be completed.

Providers whose Master Provider Index (MPI) number ends with an odd number last digit will receive an on-site review in Year 1 of the cycle and providers whose MPI number ends with an even number last digit will receive an on-site review in Year 2 of the cycle. FY 2016-2017 is Year 2 of the cycle. New providers, who have been qualified in the previous FY and have completed the Provider Monitoring Tool for New Providers by June 30th, may initially receive an on-site review in a cycle year that does not correspond to the last digit of the MPI number. ODP reserves the right to reassign a provider to an alternate monitoring group regardless of the last digit of the MPI number.

**Changes:**

For FY 2016-2017, ODP has made the following changes to the Provider Monitoring process document:

- Clarification provided in the New Providers section referencing that there is now one monitoring tool for new providers to complete prior to qualification rather than two. The Vendor Transportation Monitoring Tool for New Providers has been incorporated into the Provider Monitoring Tool for New Providers.
- In the Self-Reporting Phase section, there is a requirement for providers to email the completed MCI/Vendor Claims Trackers with the results of their self-assessment to the Lead AE.
The due date for submission of the AE Trackers to the Regional ODP Provider Monitoring Leads has changed to July 31st.

Clarification provided in the ODP Directed Follow-up Provider Monitoring Process that Regional ODP Provider Monitoring Leads will inform Lead AEs of any assigned follow-up monitoring activities.

**Provider Monitoring Tool:**

ODP completed the following changes to the FY 2016-2017 standard tool:

- Question 11 (regarding review of performance data for development of the QM plan) – Allows for an N/A option for new providers who do not have performance data to review.
- Question 61 (regarding lack of progress in progress notes) – The remediation was updated to include the provider addressing lack of progress with the team.
- Question 67 (regarding finalizing incident reports) – The guidelines were updated to clarify that only incidents for individuals in a waiver should be reviewed and remediated.
- Question 74 (regarding utilization) – This question was used for data collection purposes; and at this time, ODP has collected sufficient data related to this area. The question should be answered as N/A.

**Self-Reporting Phase:**

The overall Self-Reporting phase (Phase 1) will generally remain the same for Cycle 3, Year 2. As in Cycle 3, Year 1, providers must submit the ODP Provider Monitoring Self-Assessment Tool by November 30th using the unique link received by the provider’s primary contact via email from the ODP Provider Monitoring mailbox ([ra-odpprovidermonito@pa.gov](mailto:ra-odpprovidermonito@pa.gov)). If a link is not received on October 1st, the provider should email the Provider Monitoring mailbox immediately. Per Announcement 056-16, “Updating Provider and AE Contact Information for Provider Monitoring Fiscal Year 2016-2017,” it is required for providers to maintain accurate contact information with ODP. After the links have been issued, ODP will distribute an Announcement to let all providers know that they should have received a link and will include instructions for providers who did not receive a link.

Providers who do not submit their electronic tools by November 30th will be scheduled for an on-site review regardless of the ODP distribution assignments. Providers who fail to complete a self-assessment by November 30th more than once in a five year period will be sanctioned with a minimum 30 day suspension of payment.

As in prior years, ODP will develop and distribute sample lists to AEs that consist of a primary sample of individuals and a back-up sample of individuals. Providers are required to utilize their
back-up sample list if any Waiver participant on their primary sample list no longer receives their services. Lead AEs will not distribute the back-up sample list to providers who are scheduled for an on-site review. Instead, those providers will be required to contact their Lead AE to obtain a substitution from the back-up sample list, as applicable.

**On-site Review Phase:**

ODP assigns providers to Lead AEs at the beginning of each Provider Monitoring Cycle based upon the AE in which the provider served the most Waiver participants. Because the Lead AE both monitors and qualifies their assigned providers, ODP recommends that Lead AEs utilize their time on-site to review and gather the provider’s qualification documentation.

**Availability of resources and materials:**

The updated resources and materials for Cycle 3, Year 2 of Provider Monitoring are available by logging onto the Provider Information Center (PIC) [http://pic.odpconsulting.net](http://pic.odpconsulting.net) (ODP Business Practice Information > Provider Monitoring > Provider Monitoring Process for 2016-17) or the AE Information Center (AEIC) [http://aeinfo.odpconsulting.net](http://aeinfo.odpconsulting.net) (ODP Business Practice Information > Provider Monitoring > Provider Monitoring Process for 2016-17). As a reminder, ODP will provide the link to the new training and resource platform, along with instructions on how to create an account and access trainings, resources and communications at a later date.

**PROVIDER QUALIFICATION:**

ODP will utilize the same timeframes for the Provider Qualification process that were utilized in FY 2014-2015 (See Informational Packet 025-13 *Provider Qualification & Noncompliance Process*). Qualification applications are completed biennially.

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<thead>
<tr>
<th>TIMELINE</th>
<th>ACTIVITY</th>
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<tbody>
<tr>
<td>February 1st – April 30th</td>
<td>This date range is the timeframe that providers/vendors who are due to complete their qualification application by <strong>April 30, 2017</strong> will be able to submit their qualification applications in the Home and Community Services Information System (HCSIS) and supporting documentation to AEs. Providers are encouraged to submit their qualification materials by <strong>March 31st</strong>.</td>
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<tr>
<td>April 30th <strong>DUE DATE</strong></td>
<td>Providers/vendors who have not submitted their documentation by April 30th will be considered out of compliance with 55 Pa. Code §51.13 (d) regarding the need to be submit their documentation by the due date.</td>
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<tr>
<td>May 1st – June 30th</td>
<td>ODP will identify which providers/vendors do not have a finalized provider qualification application in HCSIS by the due date. Lead AE will send failure to comply notification to providers/vendors who have been determined to be out of compliance. The notification will inform providers/vendors that SCOs will begin transition planning</td>
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activities for an alternate provider/vendor.

| June 30th **Expiration Date** | Providers/vendors who have not become “Qualified” by June 30, 2017 will be considered out of compliance with 55 Pa. Code §51.13 (d) regarding the need to be qualified by the expiration date. Providers whose qualifications expire June 30th will not be eligible to receive payment for Waiver services rendered after the expiration date. |

**NOTE:** During FY 2016-2017, providers with MPI#s ending in an even number are due for qualification. There are some providers who are due for qualification but not due for an on-site provider monitoring review. All providers due for qualification will be designated as such on the provider sample list distributed to AEs.

**HCSIS Application:**

Prior to submitting the Provider Qualification application in HCSIS, the provider must answer the question that selects the county which assigns the application to the Lead AE. The Lead AE is based upon the AE in which the provider served the most Waiver participants.

- For new providers, please select the county where you intend to serve the most individuals.
- For existing providers, please select the county ODP has assigned to you as your current Lead AE. Your Lead AE is the AE who contacted you regarding Provider Monitoring and sent you your sample.

Choice of Lead AE will be available to update when completing a Provider Qualification application regardless of the type of application.

For additional information about the Provider Qualification application in HCSIS, please review the following information in HCSIS Learning Management System (LMS).

- ODP: PROVQ100J Provider Qualification
- Provider Qualification - Provider Job Aid - v2.4 - 09/26/14

**Provider Orientation:**

Any provider due for qualification, that was initially qualified after July 1, 2015, must submit their Provider Orientation Certificate to their Lead AE as required supporting documentation for their qualification.
Signed Provider Agreements:

AEs are required to ensure that providers have a signed Provider Agreement on file with ODP as part of Provider Qualifications. AEs must validate that providers have a signed Provider Agreement by viewing the list that is posted on the AE Information Center (AEIC) on the ODP Consulting website.

The agreement list posted on the AEIC is the only list that should be used when determining whether or not a provider has a signed Provider Agreement on file with ODP. No other agreements will be valid and/or have any legal binding between the provider and ODP. A signed copy of the agreement from the provider is no longer acceptable documentation for qualification.

Contact the OCS Help Desk at helpdesk@odpconsulting.net for further assistance.

NOTE: There may be other changes to the Provider Monitoring and Qualification processes. ODP will update the PIC and AEIC accordingly and will distribute communications to the field regarding those changes. As a reminder, ODP will provide the link to the new training and resource platform, along with instructions on how to create an account and access trainings, resources and communications at a later date.

INQUIRIES:

Provider Monitoring: Please direct any questions, issues or concerns to your Regional ODP Provider Monitoring Leads (listed below) or the Provider Monitoring mailbox at ra-odpprovidermonito@pa.gov

Provider Qualifications: Please direct any questions, issues or concerns to your Regional ODP Provider Qualification Leads (listed below) or the Provider Qualifications Mailbox at ra-odpproviderqualif@pa.gov.

Central Region:  
Beth Hovenstine – bhovenstin@pa.gov  
Cortney McCaleb – cmccaleb@pa.gov

Northeast Region:  
Joan Accardi – jaccardi@pa.gov  
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Lorraine Aul – laul@pa.gov

Obsolete Documents:  
This Announcement obsoletes Informational Memo 075-15.