

Arizona Department of Health Services Office for Children with Special Health Care Needs Children's Rehabilitative Services Administration	Effective Date: 03/02/2009 Last Review Effective Date: 02/11/2009
SUBJECT: General Administration	SECTION: GA 1.1

SUBTITLE: CRSA Annual Administrative Review Process

POLICY:

It is the policy of Children's Rehabilitative Services Administration (CRSA) to review the operational and financial performances of the Children's Rehabilitative Services (CRS) Contractor on an annual basis.

STANDARD:

CRSA will create a standardized Annual Administrative Review Tool to be used during annual site visits.

PROCEDURES:

- 1) Areas of Review:
The Annual Administrative Review is a comprehensive review encompassing the following areas:
 - a) Claims.
 - b) Corporate Compliance.
 - c) Cultural Competency.
 - d) Delegated Agreements.
 - e) Financial Management/Third-Party Liability.
 - f) General Administration.
 - g) Grievances System.
 - h) Medical Management/Utilization Management.
 - i) Member Services.
 - j) Network Systems.
 - k) Quality Management.

- 2) Administrative Review Tool:
 - a) Using the Annual Administrative Review Tool, the CRSA Review Team, led by the CRSA Division of Compliance and comprised of staff from each functional area, reviews documents, interviews the CRS Contractor's staff, and drafts a report summarizing the review findings, comments, and recommendations. The tool contains standards for each review area identified above in 1(a)-(k) of this policy and provides the basis for assessing the CRS Contractor's performance.
 - b) The final report contains a brief summary about the CRS Contractor, including the geographic service areas it serves, the length of its contract

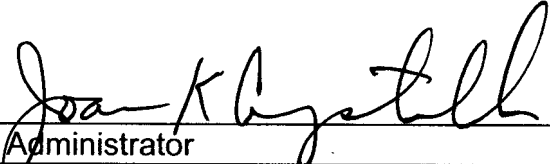
with the Arizona Department of Health Service (ADHS)/CRSA, and the total CRS member enrollment at the time of review.

- 3) Administrative Review Preparation:
 - a) The reviews usually last one (1) to four (4) days depending on the size and location of the CRS Contractor.
 - b) Prior to the review, the CRSA Review Team will meet to discuss the CRS Contractor. This briefing provides the CRSA Review Team with an overview of the CRS Contractor, a summary of previous findings, and notification of relevant staff changes. Members of the CRSA Review Team are also responsible for sharing information about the CRS Contractor.
 - c) While on-site and when additional information or clarification is required to score properly one or more standards, the CRSA Review Team members will conduct interviews with the CRS Contractor's staff from their respective review areas. To maximize the effectiveness of the review process, CRSA may limit the number of CRS Contractor's staff who attends the interviews.
 - d) The CRSA Division of Compliance's Contract Administrators are the liaison between the CRSA's staff and the CRS Contractor's staff if additional documents or clarifications are required during the review process. At the interviews, the CRSA Review Team members should have any documents about which there are questions.
- 4) Travel:

Travel arrangements to and from the on-site review will be the responsibility of the individual CRSA Review Team members participating in the review.
- 5) Goals of the Annual Administrative Review:
 - a) Perform the CRS Contractor's oversight as required by the Arizona Health Care Cost Containment System (AHCCCS).
 - b) Determine if the CRS Contractor satisfactorily meets statutory, regulatory, and contractual requirements, including those contained in the Balanced Budget Act of 1997 (42 U.S.C. § 438, et seq.), Arizona Administrative Code (A.A.C. R9-7-101 to R9-7-701), CRS Contractor's contract with ADHS/CRSA, AHCCCS policies and procedures (Medical Policy Manual (AMPM), Contractors' Operations Manual (ACOM), etc.) and CRSA policies and procedures (CRS Contractors Policy and Procedure Manual and applicable sections of the CRSA Policy and Procedure Manual), Office of Program Support/CRS Operations and Procedures Manual, and ADHS Office of Program Integrity Operations and Procedure Manual.
 - c) Determine if the CRS Contractor complies with its own policies and procedures and evaluate their effectiveness.
 - d) Increase CRSA's knowledge of the CRS Contractor's operational and financial procedures.
 - e) Provide technical assistance.
 - f) Identify areas where improvements can be made and areas with noteworthy performances and accomplishments.
 - g) Provide information to AHCCCS for its oversight purposes.

- 6) Pre-Administrative Review Activities for the CRSA Contract Administrator(s):
- a) A CRSA Contract Administrator will serve as the CRSA Team Leader and liaison between the CRS Contractor and CRSA for all operational and informational issues relating to the administrative review.
 - b) The CRS Contractor's request to change the administrative review date must be referred to a CRSA Contract Administrator.
 - c) Distribute draft schedule to the CRSA Review Team members approximately four (4) weeks prior to the CRSA Annual Administrative Review.
 - d) Request CRSA Review Team members to review the CRS Contractor's corrective action plan (CAP) from previous administrative review.
 - e) E-mail and mail the advance packet three (3) weeks before the review. The advanced packet includes:
 - i) "Here we come letter."
 - ii) Document list containing those documents to be reviewed on-site.
 - iii) Request for pre-review documentation (due to CRSA within ten (10) calendar days from the e-mail and letter date).
 - f) Mail and e-mail the administrative review tool to the CRS Contractor approximately two (2) weeks prior to the first day of the on-site review.
 - g) Plan and conduct the CRSA Review Team pre-meeting approximately one (1) week prior to the on-site review. Discuss basic CRS Contractor's facts and distribute:
 - h) Final Annual Administrative Review Schedule:
 - ii) Directions to the CRS Contractor's site, transportation issues, and hotel arrangements if traveling out of town.
 - ii) The CRS Contractor's organizational charts.
 - iii) Logistical information about document review rooms document copying, and requests for additional information.
 - iv) Report requirements and deadlines.
 - i) Ensure that all review materials received are provided to the appropriate team members in a timely manner.
- 7) On-site Review:
- a) The CRS Contractor should have all on-site review documents requested in the "Here we come letter" ready and available for review by the CRSA Administrative Review Team. The materials should be identified and arranged for easy access;
 - b) Upon arrival, a CRSA Contract Administrator will:
 - Ask to be briefed on the documents provided.
 - Ensure the document review rooms contain the necessary files for the review team.
 - Make arrangements for copies, if needed.
 - Provide the CRS Contractor's team lead the names of the CRS Contractor's staff who will be interviewed.
 - Provide the CRS Contractor lead with a list of any additional files that may need to be pulled for review.

- c) There will normally be two document review rooms. It generally works well for the clinical team to have one and the operations team to have the other. Interviews should be conducted in a third room.
 - d) Ensure that all rooms are clean and orderly at the end of each workday.
 - e) Interviews are to be conducted only during the scheduled interview time. If additional time is required, the interviewer should contact a CRSA Contract Administrator to schedule the time and location.
 - f) CRSA Review Team members should not discuss the administrative review with the CRS Contractor's staff.
 - g) Review team members should not discuss the administrative review report findings during the on-site visit, as the findings in one review area may affect findings in other areas.
 - h) The review team's on-site workday may not extend beyond the regular workday of the CRS Contractor.
- 8) CRSA will take into consideration evidence of compliance as requested during the on-site review up to two (2) business days post the on-site review.
- 9) Completing Annual Administrative Review Report:
See Attachment A, "Instructions for Completing Administrative Review Report."
- 10) Completing Corrective Action Plans:
See Attachment B, "Instructions for Corrective Action Plans."

<p>Approved:</p>  <p>CRSA Administrator</p>	<p>Date:</p> <p>3/5/09</p>
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INSTRUCTIONS FOR COMPLETING ANNUAL ADMINISTRATIVE REVIEW REPORT

1. Use the established format of the report, including the numbering of standards. Enter results into an electronic version of the Annual Administrative Review Tool and save it to the G:drive. Do not export from or import files into the existing Administrative Review files.
2. The "Finding(s)," "Documents Reviewed," "Comments," "Recommendation(s)," and "Executive Summary" sections of each standard should be entered in Arial font, 11-point type, not bolded.
3. When "contractor" refers to the CRS Contractor being reviewed, capitalize "Contractor."
4. Examples of words that will not be capitalized unless they begin a sentence or are the proper names of particular items or are a specific title are; provider manual, member handbook, policies and procedures, staff interviewed, provider(s), newsletter(s), member roster, complaint log, survey, new member letter, and audit tool.
5. Spell out words rather than using contractions (e.g. cannot rather than can't, is not instead of isn't, and should not opposed to shouldn't).
6. Numbers in findings should be presented as a numeral (i.e., 1, 17, 37, etc.) and should not be bolded, underlined, or in a larger font. This may require the writer to remove underlines.
7. Numbers in the comments and recommendations are written out if the number is "ten" or under (one, two, three, four, five, six, seven, eight, nine, and ten), unless the number is used in conjunction with another number (i.e., 3 out of 11 reports were completed).
8. All sentences should be complete sentences.
9. Compose a brief summary and performance assessment (1 to 5 sentences) of the areas you reviewed for inclusion in the Executive Summary. This should not repeat the Comments and Recommendations but a synopsis of the area's performance, both good and bad.
10. If a finding for a standard does not apply to the CRS Contractor, note why it does not apply in the Standard's comment section.
11. Comments provide additional information related to the findings such as why a rating was less than full compliance.
12. Recommendations should identify actions the CRS Contractor must take to

reach full compliance or those that it should consider to strengthen the process being reviewed.

13. If there are no comments or recommendations, indicate this under to the Comments or Recommendations section with the word "None" (capitalize the "N" only, no period).

14. The beginning phrases for Recommendations are:

The Contractor must. ... This indicates a critical non-compliance area that must be corrected to comply with the CRSA contract; and

The Contractor should consider. ... This is a suggestion by the CRSA Review Team to improve the CRS Contractor's operations although not directly related to contract compliance. There should be a minimal number of these recommendations.

15. If a recommendation is repeated from the previous year's review, the following statement should be placed in the comment section for that standard, "This is a repeat recommendation from the (year) Annual Administrative Review."

16. Rate each standard in one of the following categories (**bolded**);

Full Compliance {90-100% compliance with the standard}

Substantial Compliance {75-89% compliance with the standard}

Partial Compliance {50-74% compliance with the standard}

Non-Compliance {0-49% compliance with the standard}

Not Applicable This standard does not apply to the CRS Contractor and/or the standard is not a contractual requirement and/or there have been no instances in which the requirement applied. The findings should be deleted if the standard is N/A.

17. The scoring methodology should be explained if the score for a particular standard can be calculated in more than one way, (e.g., if findings are unequally weighted).
18. The preliminary draft report for each functional area must be submitted to the CRSA Contract Administrator no later than five (5) working days after the last day of the on-site review. This deadline is critical.
19. The CRSA Review Team member leading the interview should obtain the names and titles of the CRS Contractor's staff being interviewed (see attached sign-in sheet) and submit the original sign-in sheet with their preliminary draft report.

The names and titles of interviewees should also be included in the report's introduction section, under "Contractor Staff," and note if the individual has a medical title such as R.N., M.D., etc.

20. CRSA Review Team members must substantiate all findings, comments, and recommendations with supporting documentation or review notes. CRSA will retain these items and the final report. The review team may reference these materials as necessary.
21. CRSA Review Team members should direct questions about their tool/report, to the CRSA Contract Administrator.
22. The Annual Administrative Review final report is public information. Therefore, the draft submitted to the CRSA Contract Administrator should not disclose any proprietary information (including, but not limited to, the CRS Contractor's strategic plans, marketing plans, financial reports, etc.).
23. If the CRS Contractor fails to provide documentation during the review period, CRSA Review Team members should note the omission in the draft report. If the CRS Contractor submits documentation after the review, notify the CRSA Contract Administrator. Failure to provide documentation usually constitutes non-compliance; however, late submissions may be used to demonstrate compliance with a standard. Be sure to collaborate with the CRSA Contract Administrator before changing any ratings.
24. If CRS Review Team members discover an item requiring the CRS Contractors immediate attention, the CRSA Division Chief of the functional area should arrange for a letter of notification, Notice to Cure, or other appropriate document to be sent to the CRS Contractor.
25. After final review approval from the CRSA Contract Administrator and CRSA Division Chiefs, the initial draft of the Annual Administrative Review Report is sent to the CRSA Contractor approximately six (6) to twelve (12) weeks following the end of the review at which time the CRS Contractor will develop a corrective action plan (CAP) to correct any noted deficiencies.
29. CRSA provides a copy of Annual Administrative Review final report to AHCCCS, Division of Health Care Management.

INSTRUCTIONS FOR CORRECTIVE ACTION PLANS

1. The CRS Contractor may challenge report ratings or findings and provide CRSA with supporting documentation within two weeks after it receives the initial draft of the Annual Administrative Review report.
2. A CRSA Contract Administrator will distribute the Annual Administrative Review challenges to the appropriate review team members for their review.
3. Review team members review the CRS Contractor's challenges and supporting documentation and report the acceptance or rejection of each challenge to a CRSA Contract Administrator with two (2) weeks from its receipt. A Contract Administrator will respond to the CRS Contractor's challenges. The CRS Contractor will be notified within three (3) weeks from receipt of the challenges.
4. The CRS Contractor is required to submit a CAP for each Annual Administrative Review standard that identifies a contract compliance deficiency. The CAP must be submitted within two (2) weeks after the date of the letter accepting or rejecting the CRS Contractor's challenges (no more than seven (7) weeks after receiving the initial draft report).
5. If the CRS Contractor does not submit any challenges, the CAP is due to CRSA within four (4) weeks from the Annual Administrative Review report date.
6. A CRSA Contract Administrator will review the CAP for completeness and ensure it includes the steps to bring the CRS Contractor into compliance, dates for achieving each step, and the names of the individuals responsible for completing each task.
7. The Contract Administrator will provide the pertinent parts of the CAP to review team members for their review.
8. CRSA Review Team members must provide their CAP comments and recommendations CRS Contract Administrator within three (3) weeks. A CRSA Contract Administrator will notify the CRS Contractor of the acceptance or rejection of each CAP item.
9. If the CAP requires amendments, the CRS Contractor must revise and resubmit the CAP to CRSA within two (2) weeks after the date of the notice.
10. If the CAP is still unacceptable, a CRSA Contract Administrator will notify the CRS Contractor of the deficiencies.
11. A CRSA Contract Administrator will review the CAP on a regular, periodic basis. Any significant variation between the CRS Contractor's CAP and actual accomplishments will be documented in a follow-up letter from a CRSA Contract Administrator to the CRS Contractor, if necessary.