

Contract Monitoring

Purpose The purpose of this procedure is to establish a written orientation, communication and monitoring process in compliance with CCR Title 22, Division 1.8.

Policy It is the policy of AAA PSA 26 to ensure all AAA Contractors have clear and updated information regarding program service requirements and performance expectations. In addition, it is the policy of this AAA to have structures in place that provide for both written and oral presentation of contract Scope of Work expectations, Contractor performance monitoring, and Contractor Training. Once such structure will be regular Contractor Meetings, at least 4 per year, where AAA staff will provide training in mandatory topics, and Contractors will have an opportunity to exchange information and receive technical assistance from AAA.

Process AAA staff will provide all AAA Contract Service Providers with updated Scope of Work requirements by clear language in their annual contract. In addition, if there are any changes in program service delivery requirements throughout the fiscal year, AAA staff will keep all relevant Contractors updated through written memo and regular Contractor Meetings.

AAA Program Coordinator or Program Analyst sets up and conducts program monitoring.

The AAA Fiscal Analyst, under the supervision of the Department of Social Services Fiscal Manager, sets up and conducts fiscal on-site monitoring with agency fiscal staff and prepares a letter for the primary monitoring file. Fiscal will follow-up with agency on any findings.

Monitoring documentation is stored electronically by fiscal year by AAA Staff.

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Contract Monitoring, Continued

Procedure The following is the contract monitoring procedure:

| Step | Who | Action |
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| 1 | AAA Director | Contract Scope of Work language will be consistent with current CDA Contract Scope of Work language for each AAA service component |
| 2 | AAA Staff | Complete Contractor Orientation: <ul style="list-style-type: none"> • Each fiscal year AAA staff will review contracts with each Contractor and provide a Contractor Orientation that will review, at a minimum, all changes in Scope of Work, including contact focal points, in this current year, as well as Contractor requirements regarding Confidentiality and Incident Reporting per Lake County and CDA. For continuing contractors, this Orientation will take place at the Contractor’s Meeting scheduled before the Contract period begins, typically in May or June of each year. • All “first time” AAA Contractors will receive an individual face to face orientation before the beginning of the contract period, which will cover, at a minimum, all Scope of Work content (including focal points), AAA Policy and Procedures regarding Contractor Non-Compliance, Complaints, and Confidentiality. In addition, Lake County and CDA requirements in these areas shall be included and specified in the Orientation. • It is the responsibility of each AAA Contractor to thoroughly review all AAA Contract content and request any technical assistance and additional training needed to fully understand all AAA requirements within 30 days of receipt of current contract. |
| 3 | AAA Staff | Monitor Contracts: <ul style="list-style-type: none"> • Contract Monitoring requirements defined within the CDA AAA Contract and CCR Title 22, including updates and changes, will be reviewed with all AAA Contractors when first contracting with AAA in the provision of services to the older adults. • The first program monitoring will occur within 120 days of the contract period for each new Contractor. • The Contract Monitoring Tool for both program Monitoring and Fiscal Monitoring process, will be made available to all Contractors before the AAA monitoring occurs. The Monitoring Tool shall include all CDA required components including data tracking and reporting and security training protocols. |

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Contract Monitoring, Continued

Procedure,
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| Step | Who | Action |
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| 4 | AAA Staff | <p>Conduct Sight Visits:</p> <ul style="list-style-type: none">• Each fiscal year AAA staff will prepare a program and fiscal monitoring schedule (except nutritionist's monitorings, which are scheduled separately).• AAA Staff types site monitoring schedule, sets up site monitoring appointments for nutrition-related services. Scheduling to be completed by November.• Advisory Council Members should be encouraged to attend at least one program monitoring, especially members who are new and have not participated in the site visit process. |
| 5 | AAA Staff | <p>Send Notice of Monitoring:</p> <ul style="list-style-type: none">• Coordinator/Analyst (or Nutritionist for nutrition monitorings) provides information packet to Contractor two weeks prior to on-site visit which includes:<ul style="list-style-type: none">○ E-mail date, time, and location of monitoring○ a copy of the monitoring tool and attachments |

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Contract Monitoring, Continued

Procedure,
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| Step | Who | Action |
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| 6 | AAA Staff | <p>Prepare Program Monitoring Report:</p> <ul style="list-style-type: none"> • AAA staff shall monitor for contract compliance per CDA contract requirements. All results of monitoring will be documented and a report will be completed, filed and copies provided to Contractor within 60 days of each monitoring. • AAA staff shall file all Contractor Monitoring Reports, any findings included and the disposition of any findings for each Contractor, including all Contractor responses. AAA staff shall refer to and comply with AAA Policy and Procedure 01-002 Sanction Policy and Appeals Procedure for Contractors, in documenting, consulting and noticing when compliance issues are detected during Contract Monitoring Processes. <p><u>Security Breach:</u> If AAA staff becomes aware of any security incident or breach of confidentiality or HIPAA policy during the monitoring process, or at any time, the incident will be reported to CDA and the Chair of the Governing Board, in a timely manner and will include the disposition of the incident/breach.</p> |
| 7 | AAA Staff | <p>Provide Contractor Training and Technical Assistance:</p> <ul style="list-style-type: none"> • AAA staff will provide training annually, at Contractor Meetings, in the following areas: <ul style="list-style-type: none"> ○ Confidentiality Requirements ○ Data Reporting Requirements ○ Other Trainings, as staff allows, and as indicated by AAA staff, the current CDA contract or requested by AAA Contractors • AAA staff will provide technical assistance, per Title 22 requirements. |

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Contract Monitoring, Continued

Procedure,
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| Step | Who | Action |
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| 8 | AAA Staff | <p>Monitor Contractor for security breach, if discovered complete Security Incident Reporting and Notification of Confidentiality and or HIPAA Breach:</p> <p>A security incident occurs when AAA information assets are accessed, modified, destroyed, or disclosed without proper authorization, or are lost, or stolen. The AAA Contractor involved must report all security incidents to the AAA Director immediately upon detection.</p> <p>In the event that a security incident or breach of HIPAA or confidentiality occurs, notice will be provided by AAA Administration to CDA and the Chair of the AAA Governing Board within 2 working days. Included in the report shall be the location of the incident/breach, as well as the known disposition. AAA staff will also report the plan of action and consult with both CDA and the Governing Board Chair regarding appropriate next steps.</p> <ul style="list-style-type: none"> • Notification of Security Breach to Data Subjects: <ol style="list-style-type: none"> 1. Notice must be given by the contractor or Subcontractor to any data subject whose personal information could have been breached. 2. Notice must be given in the most expedient time possible and without unreasonable delay except when notification would impede a criminal investigation, or when necessary measures to restore system integrity are required. 3. Notice may be provided in writing, electronically, or by substitute notice in accordance with State law, regulation, or policy. |

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Authority

This document is written under the authority of CDA Contract, CCR Title 22, Lake County Policy and Procedure