

## Network Service Provider Monitoring Plan for Southeast Florida Behavioral Health Network

### Overview

SEFBHN's Network Service Provider Management Plan has been prepared to articulate its strategy and the processes by which it will manage the network and subcontractors. It provides guidance to effectively manage and monitor its subcontracts from an administrative and programmatic perspective. This plan enumerates its goals, the objectives that must be met to meet its goals and the milestones which will illustrate SEFBHN's progress. It also describes the activities that are necessary to comply with the stipulations in its contract with the Department of Children and Families, specifically those that are described in Exhibit C, Section C-1.3 Monitoring Function. Network Service Providers (NSP) will be monitored in accordance with stipulations in the contract between the Department of Children and Families (DCF) and the managing entity, including those described in Function 4, and all other applicable sections. It will utilize monitoring instruments and processes that align with DCF requirements.

SEFBHN has continuously worked to ensure that the process used to monitor NSP's is responsive to their needs and the needs of the agency. Over two years ago organizational changes were made within SEFBHN to promote staff's knowledge of all aspects of the network's system of care while simultaneously ensuring that NSP's had a primary point of contact within the agency to obtain answers to questions or required technical assistance. This structure is further outlined in this plan.

This revised plan incorporates some additional important changes to our monitoring plan that SEFBHN believes will provide appropriate oversight, utilizing a Three-Tiered System, that will identify both strengths and opportunities for improvement within our Network Providers in a collaborative manor.

- **Tier 1** – An annual internal desk review risk assessment of every provider
- **Tier 2** - A more expanded desk review based on results of the Tier 1 review which will require the NSP to provide additional information to SEFBHN
- **Tier 3** – This would incorporate the results of Tier 1 and Tier 2 and include an on-site visit either virtually or in person or a hybrid of both

Successful management of the provider network necessitates coordination with different functional areas which have a direct and immediate impact on network management must be considered. Strategic planning for these areas must be done in concert with network management strategic planning. Of primary concern in this sense are the ME Annual Business Operations Plan, Care Coordination Plan, Information Technology Plan, and Quality Assurance Plan. None of the functional areas stands on its own; all achievements and failures in one area affect the others. Those areas with the most immediate and direct impact on network management are briefly described below.

## Organizational Structure

As noted, we believe we function and serve our network providers best by working as a team. We have previously made some organizational changes to maximize our resources that in turn will result in a proactive approach to the oversight of our network.

We moved from a system where staff had tended to operate in silos – working with specific providers which had limited their ability to appreciate the scope of our system of care. Knowing that consumers migrate back and forth between providers made this organizational change essential. Staff now work across the system providing technical assistance and oversight to our network providers by programs and functions. Examples of programs provided by multiple providers include FACT Teams, Crisis Intervention and Stabilization Services, PATH, Supportive Employment, Residential Substance Abuse Treatment and Medication Assisted Treatment. Staff report to one of three managerial level staff to include the Director of Program Innovation, Director of Network Integrity and the Director of Children’s System of Care. Specialization by staff has resulted in a greater integrated approach to data analysis – identifying both positive trends and areas needing improvement throughout the network or for just one or two providers. As noted in the introduction to this plan, each NSP is assigned an SEFBHN Primary Point of Contact for programmatic purposes. This allows a comfort level for the NSP, as they can develop relationships with SEFBHN staff to troubleshoot issues that may arise and work together to develop innovative solutions.

The administrative functions of the management of our contracts (ie. ensuring all contracts and amendments have the most current contract language and any needed exhibits or pertinent documents) will now be assigned to one Compliance Administrator who will serve as the primary contact with our subcontracted providers on administrative issues. This position reports to the Chief Financial Officer (CFO).

## Monitoring Plan

SEFBHN will continue to refine a reliable and effective monitoring process for its network of subcontractors. It is noted that the impact of COVID -19 resulted in limited in person validations which necessitated a review of our monitoring process to ensure the agency was maintaining best practices in quality management. When determined to be necessary an on-site visit or a “virtual on-site visit” may be scheduled. SEFBHN will retain programmatic and administrative oversight of all subcontracts and will ensure compliance with contract terms through risk assessment, ongoing data analysis and monitoring processes. The Tiered process developed by SEFBHN is comprehensive and yet less invasive to the NSP’s day to day operations and ensures that every NSP will have a Tier 3 validation at least every 3<sup>rd</sup> year.

The following describes SEFBHN’s Tiered contract monitoring and validation process:

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### *Tier 1*

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A Tier 1 review is completed internally at SEFBHN. The Tier 1 validation was previously referred to as the

**Risk Assessment.** The Tier 1 validation includes all the same elements as were previously reviewed through the Risk Assessment but now includes additional criteria. The Tier 1 Risk Assessment Desk Review is designed to assess the quantitative aspects of the NSP's functioning such as their funding levels and compliance with specific contract areas as well as, qualitative traits like concerns from other funders and time elapsed since previous validation may have occurred. The qualitative and quantitative attributes are then averaged to trigger a ranking of either low, medium, or high risk.

## 1. Quantitative

- a. Total FY funding
- b. Number of Valid Community Complaints
- c. Review of Compliance with prior Performance Improvement Plans (PIPs)
- d. Review of Dun and Bradstreet Financial Stress and Viability Scores
- e. Funding utilization- Prior fiscal year Surplus/Deficit of Funds
- f. Completeness, accuracy and appropriateness of data submitted –(ie – is provider entering data for services they are contracted for)
- g. Percent of complaints/grievances (community-based and reportable) based on the number of consumers served.
- h. Types of contracted services with risk levels assigned to each type of service.
- i. Percentage of reports received timely as required by the contract.

## 2. Qualitative

- a. Does the contract contain any Special Funding Streams that require additional specific compliance activities on the part of the provider that include:
  - i. Block Grant Funds
  - ii. TANF Funds
  - iii. Child Welfare Funds
  - iv. Pregnant and Postpartum Women's Funds
  - v. Projects for Transition from Homelessness (PATH)
  - vi. State Opioid Response Funding
  - vii. Any Special Appropriations/Grant Funds
  - viii. Florida Assertive Community Treatment Teams (FACT)
  - ix. B-Net
- b. Compliance with audit attachment and any applicable findings
- c. Populations served – (i.e., SPMI individuals, SED children)
- d. Incident Reporting - Were any incident reports reported late? Are there an unexpectedly low number of reported incidents? Does provider have the appropriate active staff listed in IRAS.
- e. Grievances – were there denial of services or violation of rights of persons served
- f. Are other funder's reports being made available? If so, are concerns listed?
- g. Review of Accreditation status and subsequent Accreditation reports to identify strengths and material weaknesses.
- h. Is the provider or their leadership new?

- i. Period since last on-site validation

In lieu of a traditional validation report, results are captured in the Risk Assessment Desk Review template and are then shared directly with the NSP.

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### *Tier 2*

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A Tier 2 Validation is also completed as a desk review, but it involves obtaining additional documents from the NSP. While a Tier 1 evaluation looks at the agency as whole, the scope of the Tier 2 validation is customized for each individual contract SEFBHN has with the NSP. It may not be necessary to validate each contract – the Tier 1 Risk assessment will drive the decision as to which contracts to validate. For example, if a Tier 1 Risk Assessment indicates data entry errors and compliance with performance outputs in a particular contract – this may become the scope of a Tier 2 validation.

The amount of time the NSP will have to submit the requested documents will be based on the volume of documentation requested. The Primary Point of Contact and the NSP will confer to determine the amount of time needed.

After a Tier 2 validation is completed and it is determined that no Tier 3 validation is needed, a Debriefing Log will be sent to the NSP. The NSP will then have a business week to present documentation to mitigate or remove a finding. If said documentation is not received by the deadline, the tentative findings will be deemed final and will be included in the final Tier 2 validation report. A Contract Validation Review Report (CVRR) which contains observations and finding is sent to the NSP within 30 days of receipt of information requested from the NSP.

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### *Tier 3*

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A Tier 3 Validation is completed when any of the following is determined:

- The NSP is due for an on-site validation every 1, 2, or 3 years based on accreditation status and services offered.
- The NSP is new to the network and is in the first year of their contract
- A Tier 1 Risk Assessment Desk Review results in a High-Risk Ranking
- A Tier 2 Validation identifies opportunities for improvement that need further review and/or the findings did not show mitigation of the Tier 1 High Risk Ranking.

If a Tier 3 validation is needed, any opportunities for improvement identified as part of the Tier 2 validation will be shared with the Provider in the engagement letter informing the NSP of the Tier 3 validation. Official

notification of the Tier 3 validation will be sent out two weeks prior to the date of the scheduled on-site validation. The scope for a Tier 3 validation is customized for each NSP contract.

Following completion of the Tier 3 validation, a CVRR which contains observations and findings from both the Tier 2 and 3 validations will be sent to the NSP within 30 days of receipt of information requested from the NSP. For additional information regarding Tier 3 validations refer to [Contract Monitoring Process](#) of this plan.

### Scope of Tier 2 and Tier 3 Validations

With the utilization of the Tiered system the focus of NSP validations is shifting to a review of policies and procedures instead of service delivery process and documentation. This should ensure that the NSP is memorializing how they conduct business and further serves as a resource for staff.

Both Tier 2 and Tier 3 Validations can include similar Scope options which include:

- i. Attestations and Administrative Review - Validates adherence to administrative policies, ensures employment qualifications per DCF are met, and quality service delivery is taking place
- ii. Block Grant Compliance - Validates adhere to policies and guidance surrounding block grant programs
- iii. Prevention Program Service Delivery - Validates activities described in the Prevention Service Delivery Narrative.
- iv. Quality Assurance/Quality Improvement Work Products - Validates activities described in the Service Delivery Narrative.
- v. Recovery Oriented System of Care (ROSC) - Validates the agency's efforts to ensure a ROSC-focused culture
- vi. Performance Outcome Measures - Validates the quality of performance Outcome Measures
- vii. Program Specific Deliverables – Validates the agency's efforts to deliver services as describe in the contract
- viii. Other – Further review any other areas identified in the Tier 1 or, as applicable, Tier 2 validations

### Sampling Methodology

SEFBHN has developed an electronic template that assists the Primary Point of Contact in determining the Scope based on the findings of the Tier 1 Risk Assessment Desk Review and as applicable the Tier 2 Validation. The report is reviewed and approved by the Primary Point of Contact's Supervisor before proceeding. Once approved – this report will also serve as the monitoring plan.

As noted, a Tier 1 Risk Assessment Desk Review is completed annually for all NSPs. Essentially the results

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of the Tier 1 and Tier 2 validations determine whether an on-site Tier 3 validation is needed. The exception is that a Tier 3 validation will always be completed for new NSPs and those NSPs who have not had an on-site validation in 2 years. A Tier 3 validation will also be conducted annually on all NSP's without a national accreditation who provide any level of residential or in-patient services and biennially for NSP's without national accreditation in which there is no level of residential or inpatient services, or no client services provided.

If a Tier 1 Risk Assessment Desk Review results in a High-Risk ranking, then a Tier 2 Validation will be conducted. If the Tier 2 Validation further confirms the High-Risk ranking, then a Tier 3 Validation will be conducted even if the provider had an on-site evaluation the previous year. If the findings in a Tier 2 Validation mitigates the High-Risk ranking, then a Tier 3 validation will not automatically be triggered unless the NSP is due for an on-site validation as noted in the previous paragraph. The decision to complete or not complete a Tier 3 Validation for these specific providers will be made by the CEO and the COO with the reasoning documented in the contract file. Factors that may influence this would be if other actions are being taken to work with the provider such as monthly meetings or evidence of improvement in performance outputs. This will be noted in the Validation Scope Form as one of the reasons for Tier 3.

An accredited agency will never be validated less than once every three years; however, an unaccredited agency may be validated every year or every other year, based on the services being offered. This will not supersede any concerns which may require a more frequent validation.

### Monitoring Schedule

The annual monitoring schedule is developed based upon the Tier 1 Risk Assessment Desk review scoring and consideration for the length of time since the last monitoring of the agency. The results of the Tier 1 review are used to determine the annual monitoring schedule. The monitoring schedule will include what type of further validation (Tier 2 and/or Tier 3) will be conducted. Tentative dates are set but could change depending on the needs of the provider and the extent of the scope of the validations.

### Contract Monitoring Process

The changes created by our Tiered system has changed the contract monitoring (aka – contract validation) process. The Tier 1 Risk Assessment Desk Review is completed on all NSP's. A Tier 2 validation or a Tier 2 and Tier 3 validation may be required as a result. The Primary Point of Contact will take the lead for obtaining documents from the NSP for a Tier 2 validation. If a Tier 3 validation is needed the Primary Point of Contact will notify the NSP two weeks prior the scheduled on-site validation and will also provide them with written information containing the scope of the validation. SEFBHN will work with the NSP if they request a different date due to other scheduling conflicts. The following activities will occur prior to a Tier 3 validation:

Assignment of Participating SEFBHN staff – Each monitoring will be completed by designated SEFBHN staff to ensure appropriate clinical and administrative expertise is available.

Planning Meeting - Planning and preparation is critical to the on-site validation review. The SEFBHN staff

that will be participating in the monitoring will meet prior to the on-site validation to review the scope of the validation as determined by the Tier 2 validation. Monitoring tasks will be assigned to each participating staff member. The number and types of files to review, and the monitoring tools to be utilized will be determined during the planning meeting. The Primary Point of Contact's Supervisor will approve the monitoring plan which will be maintained in the contract file by the Validation Team Lead.

Conflict of Interest – Annually, all SEFBHN staff who participate in the monitoring process will sign a Conflict-of-Interest Form which will be retained in the contract management file.

### Tier 3 On-Site Validations

Providers will be made aware of the scope of the validation, along with requests for documentation (including client file selection) prior to the monitoring team's arrival on-site. Refer to Section 3. Scope of Tier 2 and Tier 3 Validations for standardized scope criteria.

Contract monitoring will be completed utilizing tools for the administrative elements, compliance with the contract and applicable federal block grant and accompanying maintenance of efforts, Florida statute and administrative code, and any other specific funding source requirements. All SEFBHN validation tools will be posted on the SEFBHN website and the provider will be directed to the website for the applicable tools when the engagement letter is sent out. Exceptions this may be when a specialized tool had been developed to review criteria specific to the provider or a service they offer. This tool will be sent directly to the provider prior to the site visit.

If the Tier 3 on-site validation is conducted virtually (all or in part) SEFBHN will provide a link to the virtual platform and schedule to be used prior to the start of the validation.

Following the completion of a Tier 3 Validation, a Debriefing Log will be sent to the NSP which includes any findings from Tier 2 and Tier 3. The NSP will then have a business week to present documentation to mitigate or remove a finding. If said documentation is not received by the deadline, the tentative findings will be deemed final and will be included in the final Tier 3 validation report.

- Debriefings with the Provider - Tentative findings, including identified strengths and opportunities for improvement will be shared with the agency prior to the monitoring team's completion of Tier 3 on-site activities and prior to the final report being prepared. A Debriefing Log will be sent to the NSP which includes any findings from Tier 2 and Tier 3 as a follow-up to the verbal debriefing. The NSP will then have a business week to present documentation to mitigate or remove a finding. If said documentation is not received by the deadline, the tentative findings will be deemed final and will be included in the final Tier 3 CVRR.
- Note: Immediate Safety Concerns - Issues that arise during the on-site validation review that indicate serious or urgent safety concerns for the provider's consumers or staff will be addressed with the provider as they are identified so action can be taken immediately. The provider will present their plan

*for addressing these safety concerns prior to the SEFBHN on-site validation team leaving for the day.*

- Debriefing with SEFBHN Leadership Team – Tentative findings, including identified strengths and opportunities for improvement will also be shared with SEFBHN leadership upon completion of Tier 3 on-site activities. The information provided in the debriefing may result in the need for SEFBHN leadership to meet directly with the provider’s leadership to address those areas that are not in compliance and have an immediate impact on services to consumers. The Primary Point of Contact will document the debriefing with the Leadership Team and maintain it in the e-contracting system.

## Reporting and Documentation

For Tier 2 Validations (in which a Tier 3 Validation was not required) the final report which is referred to as the Contract Validation Review Report (CVRR) will be prepared and sent to the NSP within 30 days of the date the NSP was to return mitigating documents noted on their Debriefing Log.

For Tier 3 Validations, a report that contains observations from both the Tier 2 and Tier 3 Validations will be sent to the NSP within 30 days of completions of the contract validation inclusive of on-site activities, and receipt of additional information requested of the provider that will further inform the results of the validation. If the report cannot be finalized within 30 days, the Primary Point of Contact in conjunction with their supervisor will document the reasons and approval must be obtained by the COO.

The Monitoring tools utilized during the validation will be reviewed for completeness to ensure comments and explanations for non-compliance. Clinical/programmatic monitoring tools will be reviewed by the Director of Program Innovation, Network Integrity and/or Children’s System of Care depending on the focus of the monitoring. The COO will review the administrative monitoring tools. All monitoring tools and work products from the monitoring will be maintained in the contract file by the validation team lead.

The Primary Point of Contact has the lead for ensuring completion of the CVRR however all staff who participated in the review will provide written input for the report. The Compliance Administrator will summarize the results of the administrative monitoring and the designated Program Specialist/Primary Point of Contact (who participated in the on-site review) will summarize the results of the clinical/programmatic monitoring with oversight provided by the applicable Director of Program Innovation, Network Integrity and/or Children’s System of Care. The report will include findings and will delineate if any of these findings require a Corrective Action or a Performance Improvement Plan (PIP). The report will be reviewed and approved by the COO. Following finalization, the CVRR will be sent to the NSP with a copy to the Department of Children and Families contract manager and the contract file.

## Desk Review

Both the Tier 1 and Tier 2 validations serve as desk reviews. As noted, results of both of these reviews are shared with the NSP. Additional desk reviews can be scheduled during the fiscal year if a concern arises (ie invoicing issues, data entry, etc.)



## Post Validation Activities – Corrective Action and Performance Improvement Plans

If a concern cannot be resolved prior to the final Contract Validation Review Report (CVRR) being issued, the NSP will be required to complete a corrective action and/or a Performance Improvement Plan (PIP) as documented in the CVRR. This relates to findings from both Tier 2 and Tier 3 validations

**Corrective actions** will apply to findings that may not be as serious – such as the need to include additional information in an existing NSP policy or procedure. The CVRR will outline the needed Corrective Action with a time frame for completion, if this time frame is different than the response time for a Performance Improvement Plan, which is 30 days. The Primary Point of Contact will be responsible for insuring the NSP submits the requested information and will also provide final approval of the documentation.

**Performance Improvement Plans** will be required by the NSP to address opportunities for improvement identified by the validation activities that are not easily rectified with submission of documentation. The provider is responsible for completing the PIP. The PIP should contain actions that will take place to address areas deemed to be insufficient and in need of improvement. The PIP should also include staff responsible to complete the needed actions and the proposed date of completion. The PIP should be submitted by the provider within 30 days of the request by the Primary Point of Contact. Within 14 days, SEFBHN will either accept the submitted PIP or send it back for additions or changes. The NSP may, with documented cause, request an extension to submit the PIP and the Primary Point of Contact in conjunction with their supervisor will review the request and provide a written approval or denial within 14 days.

A submission of a Performance Improvement Plan will not inherently constitute an acceptance of the Provider's plan. Revisions and addendums may be requested.

SEFBHN has developed a PIP tracking tool that is posted to an agency share drive. Each Primary Point of Contact will track their applicable PIPs as to when they are due, their status, and follow-up on the compliance with the corrective actions outlined in the plan. Other staff may also be involved in reviewing the information submitted by the NSP based on the types of findings (i.e., administrative, or clinical) and their area of expertise. The Primary Point of Contact for that NSP will still be responsible for ensuring follow-up is completed. Once an agreed outcome is achieved, the Performance Improvement Plan will be closed and so noted in the PIP tracking tool.

**Resolution of PIPs** – As a finding is closed due to adequate amelioration by the provider, the PIP will be updated to reflect such and the NSP will be notified by the SEFBHN staff member reviewing the finding. Unless extenuating circumstances exist, the NSP will be expected to complete all actions within the PIP within 90 days of approval of the PIP by SEFBHN. In the event the provider does not complete their Performance Improvement Plan to the satisfaction of SEFBHN, the contract may be renegotiated or terminated depending on the extent of unresolved corrective actions.

## Financial and Invoice Validation

As noted, the Tier 1 Risk Assessment Desk Review does review and consider the independent audits and the Dun and Bradstreet Financial Stress and Viability Scores for each of our NSPs to assist in determining their financial health. Initially, providers will be required to forward the most recent annual audited financial statement to allow for the review of such financial areas as cash position and reserves, annual revenue and expenses, any reported losses for the prior year, and management letter comments prepared by a Certified Public Accountant to gain a comprehensive overall agency picture. Large line-item variances will be discussed with the agency to determine how to best support the budgeted item (Ex: address staffing levels, number of vacant positions, over or under producing of units, etc.). The purpose is to evaluate if there are any financially impacted areas of the agency that may affect future contracting and utilization of DCF contracted funding. SEFBHN will be utilizing the services of an independent CPA to review the audits which will provide the level of expertise needed to fully analyze them and identify areas of concern. SEFBHN will utilize industry standards for evaluating financial strengths; e.g., financial ratios, working Capital, etc. SEFBHN will work with subcontractors that have significant issues in this context to ensure there is no disruption in services.

SEFBHN along with Carisk Partners developed an electronic invoice system that has streamlined the invoice submittal process for the NSP. NSP's submit monthly invoices in line with their individually identified method of payment in their contract. Invoices are reviewed and payments made based on the submission and accuracy of all required documentation reflecting services rendered, identified clients (for client specific services), and allowable cost breakdowns for such services based on 65E-14's guidance regarding covered services, as negotiated.

The goal is to continue to refine the invoice validation process to ensure the Department only pays for needed, appropriate services as the payor of last resort. The process will include strategies such as:

- i. Electronic validation of aggregate data against invoice
- ii. Notification to subcontractors of data accuracy issues
- iii. Carisk Partners staff conducting checks of data accuracy
- iv. Review of subcontractors' processes related to eligibility, data submission and validation, and invoicing
- v. Validation of funding requirements being met; e.g., block grants

SEFBHN tracks subcontractor fund utilization, monthly. If a subcontractor is not drawing down funds, SEFBHN notifies the subcontractor and if appropriate, involves our staff for additional technical assistance. SEFBHN may reallocate or procure unused dollars to another subcontractor. This process ensures that all available dollars are used for direct services.

SEFBHN will review a percentage of subcontractors' administrative policies (MIS, Fiscal, Internal Control, Human Resources, and Programmatic) for completeness and accuracy during the annual contract

validation. The budget, financial reports, fiscal controls, audit and other relevant documentation are also reviewed. SEFBHN will limit its monitoring of accredited providers in accordance with Florida Statute 394 and the Master Contract with DCF, as much as possible. SEFBHN may review other methods to reduce monitoring of accredited organizations to reduce administrative costs to the Managing Entity and Providers.

The Finance Department will conduct regular reviews of the network's and subcontractor's administrative and programmatic expenditure reports to look for opportunities for cost containment. If an expenditure item appears to be excessive, SEFBHN will contact the subcontractor for clarification and justification. Only costs deemed allowable, reasonable, and necessary will be included as part of an agency's total allowable operating expense.

### **Additional Network Integrity Oversight Activities**

Additional activities that support Network Integrity include:

- While formalized contract validation activities are important and allow us to drill down on issues that require further analysis and possible corrective actions, SEFBHN also understands the importance of open and ongoing communications with our large community behavioral health centers since they provide the largest cross section of services to our most vulnerable consumers. We meet with the leadership teams from these community behavioral health centers on a monthly basis. These meetings provide a forum to review trends in data and performance on the part of the providers, concerns related to community complaints or reported incidents and any issues that represent hurdles for these agencies in providing quality services.
- Monthly Continuous Quality Improvement Meetings are conducted with providers that cover a wide range of topics that include but are not limited to information about new initiatives and how they may be impacted, changes to states and SEFBHN policies, new services within and external to the network and information about our validation processes.
- SEFBHN has also formalized a procedure related to contracting with new providers. Prospective providers will be required to submit Information about their agencies to include:
  - Their experience providing behavioral health services
  - Their infrastructure
  - If they were ever terminated for cause by another funder for cause
  - If they ever had a license revoked for cause
  - If they are a Medicaid provider
  - If they are accredited

Having this information on an entity that we have no experience with will allow us to enter into contracts with new providers with greater confidence that the needs of our consumers will be met. Further information on this process is outlined on SEFBHN Policy 319.00 – Contract Procurement – Direct Consumer Services

### **Policies and Procedures**

SEFBHN's Policy and Procedures that support Network Service Provider Monitor Activities include: 102.00

Transparency; 103.00 Public Access to Information; 104.00 Public Meeting Notice; 101.00 Conflict of Interest, and 319.00 Contract Procurement – Direct Consumer Services

## Service Delivery Narratives

To further ensure that the network providers are maintaining compliance with the terms of their contracts and Block Grant requirements throughout the year, SEFBHN requires them to complete a Service Delivery Narrative (SDN) on an annual basis. Information to be reported in the SDN includes but is not limited to Strategic Planning and Priorities, Family and Natural Supports, Wraparound Practices, Integration of Behavioral Health and Primary Care, Waitlist Management, Certified Peer Recovery Services, Trauma Informed Care, Level of Care Assessments, Care Coordination, Medication Assisted Treatment, Staff Wellbeing, and Quality Assurance Practices and how Prevention Services funded by the SAPT Block Grant are delivered. The SDN's are reviewed by SEFBHN staff and any additional information that may be needed by the provider are addressed through the provider's SEFBHN Primary Point of Contact. The approved Service Delivery Narrative will be maintained in the contract file. As noted under Section 3. Scope of Tier 2 and Tier 3 Validations, the scope can include a QA/QI review of the SDN to ensure that the NSP is offering services as they outlined in their SDN.

## Document Revision History

- Created in Fiscal Year 2018-2019
- Reviewed and updated for Fiscal Years:
  - FY 2019-2020: April 2019
  - FY 2020-2021: March 2020
  - FY 2021-2022: April 2021