

Children’s Board of Hillsborough County (CBHC)

<b>Procedure Name:</b> Provider Improvement Plan	<b>Category:</b> Program Support
<b>Effective Date:</b> October 1, 2011	<b>Revision Date:</b> October 1, 2011; May 28, 2013; September 17, 2015; July 9, 2016

**Purpose:**

In order to ensure that CBHC funding is used in the most effective and efficient way, CBHC funded agencies (also known as “Providers”) are required to demonstrate how funding is helping children and their families through measureable contract requirements and performance outcomes.

CBHC funded agencies that are not meeting the desired outcomes or are not in compliance with general terms and conditions of the CBHC contract are identified and solutions through an improvement plan are developed. This procedure is defined by a three level monitoring system.

Providers that are placed on any level of a Provider Improvement Plan (PIP) will be monitored more regularly by the assigned CBHC program staff in addition to standard monitoring requirements.

**LEVEL 1**

**Contract Issue** – The provider has not successfully or accurately completed a contract task by the designated due date.

1. Contract Issues include but are not limited to:

- difficulty in achieving service levels or program outcomes;
- services are not being implemented at the level specified in the contract;
- staff needed to perform services have not been hired, position vacancies have not been filled;
- there is excessive attrition of staff; excessive unexpended funds or other fiscal issues (untimely submissions, inaccuracy, etc.);
- non-compliance with submitting documentation per terms and conditions;
- other contractual or performance concerns.

2. **Procedures:**

a. **Plan Development** – The CBHC Director of Programs will meet with the CBHC Contract Manager and any other staff assigned to the contract to discuss the identified concerns. The concerns will then be shared with the Provider in a face to face meeting. The Contract Manager will assist with documenting the information on the Provider Improvement Plan form and indicate the effective date next to “Contract Issue”. Once finalized, the Provider Improvement Plan must be signed by the Provider authorized official as listed in Attachment 5 of the Provider Agreement and the CBHC Executive Director or Director of Programs.

b. **Monitoring** – Contract Manager will follow up on action steps with other CBHC assigned staff (if applicable) and with Provider based on dates outlined in the plan.

c. **Documentation** - A signed copy of the Provider Improvement Plan form will be placed in the contract file and appropriate electronic master file located on the CBHC shared drive for the appropriate fiscal year.

d. **Notifications** - The CBHC Director of Programs will notify the CBHC Executive Director, and CBHC Senior staff if a Provider has been placed on a (Level 1) Contract Issue.

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A Provider Improvement Plan form documenting the required actions and due dates any will be transmitted to the Provider's authorized official.

e. **Extension** – If a Provider requests an extension to complete a Provider Improvement Plan Contract Issue, the extension must be pre-approved by the CBHC Director of Programs.

f. **Plan Result:**

- If the Contract Issue is resolved by the deadline date, the Provider will be notified in writing by the CBHC Director of Programs.
- If the Contract Issue is not resolved by the deadline date(s), including any approved extension, the Provider will be placed on a Level 2 "Performance Improvement Plan".

### LEVEL 2

**Performance Improvement** – The Provider did not satisfactorily comply with a contract issue (level 1) and/or has presented an infraction that requires a formal write up that will be shared with Board members.

1. Performance Improvement issues include but are not limited to:

- multiple inaccuracies identified by a data integrity check;
- demonstrated weakness in agency infrastructure to support the level of service;
- there is excessive attrition of staff; excessive unexpended funds or other fiscal issues (untimely submissions, inaccuracy, etc.);
- non-compliance with use of measurement tools or submitting documentation/data as requested;
- other contractual or performance concerns.

2. **Procedures:**

a. **Plan Development** –CBHC Contract Manager and CBHC Director of Programs will meet with any other CBHC staff having regular contact or working knowledge of the agency to discuss the identified performance issue(s).

CBHC staff will then meet with Provider program and/or fiscal staff and any authorized official to discuss pertinent facts, issue(s), actions and deadlines to draft a Provider Improvement Plan form. Once finalized, the Provider Improvement Plan must be signed by the authorized official of the Provider as listed in Attachment 5 of the Provider Agreement and the CBHC Executive Director or designee.

b. **Monitoring** – Progress under the Provider Improvement Plan must be monitored regularly with updates to assess progress being made in accordance with the deadlines specified.

c. **Documentation** - A signed copy of the Provider Improvement Plan form will be placed in the contract file and appropriate electronic master file located on the CBHC shared drive for the appropriate fiscal year.

d. **Notification** – The CBHC Director of Programs will notify the CBHC Executive Director, CBHC Senior staff, CBHC Executive Board and the Provider's Board Chair if a Provider has been placed on a (Level 2) Performance Improvement.

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A Provider Improvement Plan form documenting the required actions, due dates and any potential sanctions will be transmitted to the Provider's authorized official with a copy to the Providers Board Chair within 5 business days of the meeting.

e. **Extension** – If the Provider requests an extension, it must be pre-approved by the CBHC Executive Director or designee, and changes must be documented on the Provider Improvement Plan form. If the Provider Improvement Plan deadlines are approved and extended, performance will be re-evaluated by the new end date.

f. **Plan Result:**

- o When the Provider Improvement Plan is satisfactorily completed, the CBHC Executive Board, Provider and Provider Board Chair will be notified in writing by the CBHC Director of Programs.
- o If the Provider Improvement Plan is not resolved by the deadline date(s), including any approved extension, the Provider will be placed on a (Level 3) "Program of Concern".

### LEVEL 3

**Program of Concern** - The Provider did not satisfactorily comply with one or all of the action items in the Performance Improvement Plan (Level 2), demonstrates new contract violations, and/or has presented an infraction that requires a formal write up that will be shared with Board members.

1. Programs of Concern issues include but are not limited to:

- Failure to address concerns previously identified
- Failure to achieve desired service levels or outcomes performance
- Misuse of CBHC funds or repeated lack of fiscal accountability

2. **Procedures:**

a. **Plan Development** – The CBHC Executive Director or designee and the Provider's program and/or fiscal staff and authorized official will meet to discuss the contract deficiencies requiring corrective actions and deadlines for completing the required action(s). In addition, CBHC will advise the Provider what, if any, sanctions might be imposed if the Provider is not in satisfactory compliance by the specified date(s).

b. **Monitoring** - CBHC will draft a Provider Improvement Plan form. Once finalized, the Provider Improvement Plan must be signed by the authorized official of the Provider as listed in Attachment 5 of the Provider Agreement and the CBHC Executive Director or designee.

c. **Documentation** – A signed copy of the Provider Improvement Plan form will be placed in the contract file and appropriate electronic master file located on the CBHC shared drive for the appropriate fiscal year.

d. **Notifications** – The CBHC Director of Programs will notify the CBHC Senior Staff, the CBHC Executive Board and the Provider's Board Chair if a Provider has been placed on a (Level 3) Program of Concern.

A Provider Improvement Plan form documenting the required actions, due dates and any potential sanctions will be transmitted to the Provider's authorized official with a copy to the Providers Board Chair within 3 business days of the meeting.

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e. **Extensions** – Not applicable on a Level 3 Provider Improvement Plan

f. **Plan Result:**

- When the Provider Improvement Plan is satisfactorily completed, the CBHC Executive Board, Provider and Provider Board Chair will be notified in writing by the CBHC Director of Programs.
- If the Provider Improvement Plan is not resolved by the deadline date(s), the appropriate sanctions will be approved by the Executive Director and the most senior CBHC Board officer available.

Sanctions may include but are not limited to:

- withholding of payments;
- contract termination;
- or suspension of the CBHC Provider Agreement in whole or in part. (Refer to Attachment 3, General Terms and Conditions, 15. Performance.)

g. **Notification of Sanctions:**

- Notification will be in writing via certified letter to the Provider's authorized official and to the Provider's Board Chair by the CBHC Executive Director.
- Withholding of reimbursement will be reported at the next Board meeting.
- Reimbursement may resume after the Provider has met such conditions as the Executive Director and the CBHC senior available Board officer have approved.
- Notice of resuming payment action will be reported at the next Board meeting.
- If the sanctions involve terminating the agreement, actions must be taken in accordance with Attachment 3, General Terms and Conditions, 16. Termination in addition to completing the contract closure checklist.