TOPIC: COMPLIANCE- CONTRACT MONITORING

PURPOSE: To ensure care treatment or services provided through contractual agreements are provided safely and effectively.

POLICY: PCC acknowledges the importance of monitoring relationships with contracted service providers through evaluation and management of the organizations expectations outlined in the agreement. Outlined below demonstrates the contract relationship, level of responsibility within PCC and procedures directly pertaining to specific contracts.

PROCEDURE: PCC senior leadership reviews all contracts on an annual basis and identified the following as the highest risk/highest volume contractual agreements. These include:

- Thresholds, Inc.
- Quest
- Global Insight Solutions
- Alliance

THRESHOLDS, INC.

LEVEL OF RESPONSIBILITY: Director of Behavioral Health

- 1. Director of Behavioral Health (BH) monitors monthly productivity of contracted service providers through the outlined agreement. PCC's Financial Analyst provides Director of BH monthly productivity reports for the department. The Director of BH will review the monthly report of achieved productivity with PCC's CEO and Thresholds, Inc.'s leadership (e.g. Chief Medical Officer).
- 2. Quarterly meetings occur between PCC Director of BH, Thresholds, Inc. leadership including CMO and clinical case managers. The purpose of these meetings will be to review the following:
 - quarterly year to date productivity of expected service provision
 - administrative bidirectional referrals between the representative agencies
 - high risk case reviews and treatment planning
 - health information exchange
 - · revenue/expense reports

QUEST

LEVEL OF RESPONSIBILITY: Chief Operating Officer

- 1. The Chief Operating Officer monitors the services provided by Quest at PCC sites. This includes the provision of discounted services as required to PCC patients under 200% of the Federal Poverty Level.
- 2. A monthly meeting is held with the Chief Operating Officer, clinic administrators, and several key members of the Quest management team. At these meetings, the following items are reviewed:
 - Quality of services provided
 - Onsite phlebotomy staff issues or concerns
 - Billing issues or concerns
 - · Opportunities for additional testing

GLOBAL INSIGHT SOLUTIONS

LEVEL OF RESPONSIBILITY: Director of Billing

- 1. The Director of Billing monitors, audits and reconciles all services provided by Global Insight Solutions (known as GIS). Claim and billing services provided by GIS include: electronic claim submission and claim follow up; processing of all claim payments; patient payment arrangements; bad debt determination and adjustments; generation of patient statements every 30 days.
- 2. The PCC Director of Billing meets with key members of the GIS team on a monthly basis to go over the following areas:
 - a. Accounts Receivable (aging report; activity taking place on outstanding claims).
 - b. Collection staff productivity (tasks assigned and completed).
 - c. Results of audit that the PCC Director of Billing conducts on EOB's posted by GIS staff.
 - d. Any other outstanding issues that may need to be addressed (Centricity updates; workflow revisions; etc.)
 - e. Review any insurance updates and training needed for GIS/PCC Staff.

ALLIANCE

LEVEL OF RESPONSIBILITY: Director of Health Information and Technology and Medical Director of EHR

1. Director of Health Information and Technology is responsible for all administrative activities related to EHR. Medical Director of EHR is responsible for all clinical aspects of EHR. These two individuals work together as a team to interface with Alliance of Chicago Community Health Services LLC.

- 2. PCC's Director of Health Information and Technology along with Medical Direct of EHR meet on a monthly basis with the Alliance to review services provided by the Alliance as outlined in contract which include reviewing the following:
 - Evaluate performance issues and ensure continuous functioning of the Licensed Software on the basis of a 99.7% network up time
 - Meet meaningful use requirements
 - Provide monthly service pack updates
 - Train staff to operate and utilized the Licensed Software
 - Generate customized reports
 - Advise and consult with PCC in respect to customizing clinical content for the Licensed Software

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