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Corrective Action Plan: General Revenue Vendor Billing Reconciliation Procedure

1 message

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Fri, Sep 1, 2017 at 4:54 PM

To: Jemith Rosa <jrosa@caresfl.org>

Cc: Ann Marie Winter <annmarie.winter@aaapp.org>, Peggy Herlache <peggy.herlache@aaapp.org>, Katherine Guy <katherine.Carleton@aaapp.org>, George Popovich <gpopovich@caresfl.org>

Jemith,

Per your ADI, CCE, HCE Annual Monitoring report dated March 13, 2017, follow up was required by April 17, 2017 regarding Standard #15 on page 9 of the report. Standard 15 specifically relates to having a system in place to reconcile vendor billing and enter units into CIRTS.

As of September 1, 2017, the AAAPP has not received verification, by formal procedure, reflecting the actual vendor billing reconciliation process. This process, as discussed via technical assistance numerous times, must include the Case Aide Note Template that was developed following DOEA Monitoring last November, due to DOEA finding poor documentation of Case Aide verification of services in the client records they reviewed.

Requests for the vendor billing reconciliation procedure are as follows:

1. Feb 21 - 23rd 2017 annual monitoring visit - issues were discussed and procedure requested
2. 3/1/2017 email regarding confirmation that procedure should be sent when referral/vendor agreements provided
3. 3/13/2017 Annual Monitoring report sent to CARES, Inc.
4. 4/28/2017 follow-up email
5. 5/1/2017 Letter received from Jemith stating billing reconciliation process being implemented and will be eff 7/1/2017
6. 5/23/2017 annual monitoring follow-up letter
7. 5/23/2017 follow-up email regarding the procedure being requested
8. 6/5/2017 follow-up response to CARES response to above
9. 6/22/2017 email from Tawnya to George (gave due date of 7/7/2017 but not received).
10. 7/10/2017 CAP response received included the Vendor Monitoring process but not the Billing Reconciliation process (we already had the Vendor Monitoring process)
11. 7/11/2017 email discusses again the procedure needed and sent prior procedure for reference
12. 8/8/2017 Project Directors training -was included on Agenda as follow-up item and included a handout with tips of items that should be included in the procedure (such as checking hold logs, reviewing current care plans etc
13. 8/9/2017 Case Aide Templates were sent to ensure they were being incorporated into the billing procedure as well as activities that are documented as being done on the CA template.
14. 8/14/17 Met face to face with AAAPP and Gulf Coast Jewish Family and Community Services regarding how Gulf Coast has implemented the CA note template and how they conduct vendor billing reconciliation.
15. 8/15/17 email sent regarding follow up from visit with Gulf Coast and advising Billing Reconciliation process would be reviewed during 8/30 monitoring visit.
16. 8/24/17 email sent from Ann Marie to Jemith regarding outstanding items, including the billing reconciliation procedure with a due date of 8/31/17.
16. 8/30/17 Peggy monitored on-site; CA template still not in files.
17. 8/31/17 Email from George to Peggy indicates the templates are created, but no implementation dates or written procedure received.

Due to extensive technical assistance completed with CARES and the potential for a finding from DOEA during their upcoming monitoring visit in November 2017, which may result in financial consequences, we have met internally and are formally requesting a Corrective Action Plan.

Page 25, Section H. of your 2017-2018 CCE Contract states:

H. Corrective Action Plan

1. Sub-recipient shall ensure 100% of the deliverables identified in Section II. D.1-3 of this contract, are performed pursuant to contract requirements.
2. If at any time the Sub-recipient is notified by the AAAPP that it has failed to correctly, completely, adequately perform contract deliverables identified in Section II. D.1-3 of this contract, the Sub-recipient will have ten (10) days to submit a Corrective Action Plan ("CAP") to the AAAPP that addresses the deficiencies and states how the deficiencies will be

remedied within a time period approved by the AAAPP. The AAAPP shall assess a Financial Consequence for Non-Compliance on the Sub-recipient as referenced in Section III.I of this contract for each deficiency identified in the CAP which is not corrected pursuant to the CAP. The AAAPP will also assess a Financial Consequence for failure to timely submit a CAP.

3. If the Sub-recipient fails to correct an identified deficiency within the approved time period specified in the CAP, the AAAPP shall deduct the percentage established in Section III.I. of this contract from the payment for the invoice of the following month.

4. If Sub-recipient fails to timely submit a CAP, the AAAPP shall deduct the percentage established in Section III.I. of this contract for each day the CAP is overdue. The deduction will be made from the payment for the invoice of the following month.

The Vendor Billing Reconciliation procedure, including an outlined plan of how the Case Aide Note Template will be utilized must be received by the AAAPP no later than Monday, September 18th, close of business. Failure to submit a complete procedure and implementation plan will result in financial consequences as outlined in the CCE contract, page 25, Section I:

I. Financial Consequences

The AAAPP will withhold or reduce payment if the Sub-recipient fails to perform the deliverables to the satisfaction of the AAAPP according to the requirements referenced in Section 11.D of this contract. The following financial consequences will be imposed if the deliverables stated do not meet in part or in whole the performance criteria as outlined in Section 11.D. of this contract.

3. Administrative duties as referenced in Section 11.D.3 of this contract - Failure to perform management and oversight of CCE Program operations will result in a 2% reduction of payment per business day. The reduction of payment will begin the first business day following the AAAPP's notification to the Sub-recipient that the identified deficiency was not cured or satisfactorily addressed in accordance with the AAAPP approved CAP, referenced in Section 111.H.

Regards,

Tawnya

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