

## **Community Programs Corrective Action Policy and Procedure Executive Summary**

### **Purpose of Corrective Action Policy and Procedure**

Community Programs (CP) developed a corrective action policy and process (CAP) to provide guidelines to CP staff and managers regarding the identification and resolution of problems/issues affecting CP contractors. The CP sections involved in this process include Community Behavioral Health Services, HIV Health Services, HIV Prevention Services, Housing and Urban Health, Maternal, Child and Adolescent Health and Primary Care.

### **Establishment of Contract Oversight Committee**

Community Programs assembled a Community Programs Contract Oversight Committee (CPCOC) managed by Barbara Garcia, Deputy Director. The CPCOC is comprised of CP Section Directors and other key CP staff and meets monthly to review issues raised concerning specific contractors. The CPCOC develops strategies to resolve those issues, and for serious issues develops a CAP grid as the basic implementation tool (see Appendix II). Program Managers play a key role as they are instrumental in identifying contractor issues and are responsible for implementing strategies to resolve those issues. To facilitate effective and efficient management oversight, Program Managers from different CP sections who are assigned to the same contractor are involved in the corrective action affecting the shared contractor.

### **Problem Identification and Corrective Action Process**

There are various types of problems that may require a CAP to resolve. Appendix I summarizes these problems by category. Depending on whether the problem was identified through the Controller's Joint Fiscal and Compliance Monitoring process, through the Department's annual Program Review Monitoring process, or outside of these two processes, the basic follow-up is essentially the same. The agency is notified of the problem and if an informal resolution is possible it will be resolved accordingly. If not, a formal plan to resolve the issue is developed in coordination with all staff involved with this agency, and the resolution of the issue is monitored and reported to the Health Commission Finance Committee. Regardless of how or under which venue the problem was identified, the CPCOC is involved in the resolution, including addressing lack of corrective action by the contractor.

### **Health Commission Finance Committee's Review of Corrective Actions**

Contracts undergoing a CAP process will be scheduled to go before the Health Commission Finance Committee for review, and depending on the timing, for recommendation related to annual contract renewal.

With regard to standardized monitoring, contractors with monitoring scores lower than three (3) in any monitoring category will be referred to the CPCOC for review. Should the CPCOC conclude that (1) the issue causing the low score is very specific and is not an indicator of other possible problems that may impact the agency's functioning or clients' well-being, and (2) if this issue has already been resolved or could be readily addressed via the agency's plan of correction developed in response to standardized annual monitoring, the agency's contract will be added to the list of contracts submitted

to the Finance Committee for approval without comments. A note will be included to reference the dispensation of the issues.

Should the CPCOC determine that the scoring and related monitoring category are critical to the operation of the contractor, the CPCOC will develop a corrective action plan and formally report to the Finance Committee prior to contract approval hearing. If significant issues/circumstances exist such as a cash flow shortage that would require immediate contract certification, Community Programs staff will place the contract on the Finance Committee's approval list noting that a corrective action process is underway. If no such significant issues/circumstances exist, the contract will be scheduled for a hearing before the Finance Committee.