

6004-G Monitoring and Oversight

EFFECTIVE DATE: January 29, 2020

REFERENCES: 42 CFR 438.230(b); 42 CFR 438.608; ACOM 103; [Operations Manual, Chapter 6000, Policy 6004](#).

This Policy stipulates requirements for the internal auditing, monitoring, and oversight of Long-Term Services and Supports (LTSS) provided by the Division, in accordance with the Division's Monitoring and Oversight Plan.

Definitions

- A. Monitoring - The collection of data on a consistent basis as part of a plan to ensure contractual compliance and operational excellence.
- B. Operational Area - Synonymous with business unit, functional area, or department within the Division.
- C. Compliance Assurance Audit - A focused review of an operational area's compliance with contract requirements utilizing a standardized audit tool; the audit tool will include standards by which each business unit audited will be measured.
- D. Key Performance Indicator (KPI) - A metric selected to provide quantifiable data in relation to the operational performance of a specific operational area or Business Unit
- E. LTSS KPI Schedule of Annual Data Submissions - An overview of the KPI's collected from each operational area/Business Unit including the designated Subject Member Expert, frequency of data collection, and submission for each KPI required.
- F. LTSS KPI Annual Data Submissions Template - The template provided by the Corporate Compliance Unit used by each operational area SME to collect and submit respective KPI's.

Monitoring and Oversight Plan Overview

The Monitoring and Oversight Plan has been developed as part of the Division's formal Corporate Compliance program. The plan implements a continuous, formal monitoring mechanism and compliance assurance auditing of various operational areas across the Division. The combined approach of monitoring and auditing aims to provide a preventive and corrective action approach that ensures compliance with AHCCCS contractual requirements and federal and state laws and regulations, while ensuring quality in operational and service delivery. Monitoring will be conducted across the Division's operational areas and will provide executive leadership an aggregated view of the organization's compliance health status.

A. Compliance Assurance Audits

A primary component of the Division's overall Monitoring and Oversight Plan is a system of compliance assurance auditing of each major LTSS operational area. Compliance assurance auditing will be performed by an internal auditing/monitoring business unit within the Corporate Compliance department in accordance with a planned schedule of focused audits throughout the year. The type, number, frequency, and timing of compliance assurance audits will be determined by the Compliance department leadership and approved by the Corporate Compliance Committee. Additionally, special, comprehensive audits of programs and operational areas will be

selected and conducted throughout the year by the Corporate Compliance team. The audits will focus on detecting and correcting fraud, waste and abuse; Health Insurance Portability and Accountability Act (HIPAA) violations; and risks to fiscal integrity but may also be a source of discovery that would identify a need for further compliance audits of specific operational processes.

B. Key Performance Indicators

Another key component of the Monitoring and Oversight Plan is a system of ongoing collection, compilation, and dissemination of Key Performance Indicators (KPI) across the Division's operational areas on a regular basis. KPI's were selected based on current internal, self-audit data, and AHCCCS contractual requirements and deliverables. Each operational area subject matter expert (SME) will be responsible for collecting and submitting designated KPIs on a consistent basis in accordance with the annual data submission schedule via the template provided by the Corporate Compliance Unit.