October 5, 2017

Barbara Palmer, Director
Agency for Persons with Disabilities
4030 Esplanade Way, Suite 380
Tallahassee, FL 32399-0950


Dear Director Palmer:

In accordance with the provisions of Section 20.055(6)(h), Florida Statutes, we asked the responsible manager for the current status of the finding identified in the report.

The finding, recommendation, the manager's original response, and the October 2017 status of corrective actions are attached. We have reviewed these and believe the actions taken are acceptable.

Please contact Shawn McCormick, Director of Audit, at 414-8774 if you have any questions.

Sincerely,

Shawn McCormick, CPA, CISA
Director of Audit

Enclosure

cc: JLAC@leg.state.fl.us
Eric Miller, Chief Inspector General
Ms. Sherrill F. Norman, Auditor General
Karen Hagan, Chief of Staff

http://apdcares.org

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<tr>
<th>Status Type</th>
<th>Report No.</th>
<th>Report Title</th>
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<tr>
<td>STATUS UPDATE - 6 MONTHS</td>
<td>2017-180</td>
<td>Statewide Federal Financial Awards Audit</td>
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#### Contact Person
Lori Gephart, Registered Nurse Consultant

#### Program/Process
Programs

#### Phone No.
(850) 921-3786

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<tr>
<th>Activity</th>
<th>Accountability</th>
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<td>Utilization Control and Program Integrity</td>
<td>Clinical Supports</td>
<td>YES 12/31/2017</td>
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#### Finding:
No. 2016-043
Date 10/5/17

The FAPD did not always ensure that continued stay reviews were conducted every 6 months for beneficiaries of Intermediate Care Facility Services for the Developmentally Disabled (ICF-DDs).

#### Recommendation
We recommend that continued stay reviews of ICF-DD beneficiaries be timely conducted in accordance with Federal regulations.

#### Original Response/Action Plan
The Agency concurs.

FAPD issued a Request for Information to ascertain if there are vendors interested in contracting to provide the Utilization Review/Continued Stay Review (UR/CSR) function. FAPD is now working on a Request for Proposal in hopes that a vendor can be secured. In the meantime, FAPD is advertising for temporary OPS positions for each of the regions to help support the workload issue. These temporary positions will be dedicated to the completion of Continued Stay Reviews.

FAPD will continue to conduct monthly Medical Case Manager conference calls (Statewide and Regional) for staff (including supervisors). ICF UR/CSR is a standard topic on the agenda.

FAPD does not have rule making authority specific to the ICFs. The Agency for Health Care Administration (AHCA) promulgated their revisions to the ICF Handbook and the State Plan July 2016. FAPD is working on updating our procedures and forms.

FAPD will continue to monitor Regional completion of Continued Stay Reviews (CSR) and Certificates of Need completed by the facilities. An updated CSR form will help in the monitoring process.
Status Updates

- Open
- Partially complete
- Complete
- Complete pending verification by OIG
- Management assumes risk

FAPD issued a Request for Information to ascertain if there are vendors interested in contracting to provide the UR/CSR function. FAPD will submit a Request for Proposal (RFP) by the end of the summer to procure a vendor to administer the UR/CSR process. Regional FAPD offices hired temporary OPS positions to help support the workload issue. These temporary positions will be dedicated to the completion of Continued Stay Reviews.

FAPD conducts monthly Medical Case Manager conference calls (Statewide and Regional) for staff (including supervisors). ICF UR/CSR is a standard topic on the agenda.

AHCA promulgated their revisions to the ICF Handbook and the State Plan July 2016. The Handbook does not address procedure. FAPD does not have rule making authority specific to the ICFs. FAPD continues to work with AHCA regarding AHCA promulgating rules for the ICF UR/CSR process.

FAPD continues to monitor Regional completion of Continued Stay Reviews and Certificates of Need completed by the facilities. FAPD has worked on an updated CSR form and procedure but has not moved further until the RFP process is complete.