

Quality Master Perpetual Performance Improvement Plan FY 2020-2021

## Overview

This document represents the Master Perpetual Performance Improvement (PPI) plan for Eckerd Connects. It outlines the approach utilized by the organization to implement perpetual performance improvement and quality assurance process. Together, with relevant documents, this plan comprehensively addresses and supports a culture of perpetual performance improvement throughout all levels of the organization, engaging all five Spokes. The Spokes represent the five domains that support the youth, families and communities that Eckerd Connects serves. The Spokes comprise the domains of Quality, Growth and Transformation/Operations, Staff, Finance, and External Relations. As a performance-based organization, we clearly define, collect, validate, analyze, and communicate our outcomes to make informed decisions based on evidence.

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### Introduction (Mission, Vision, Scope)

The Master Perpetual Performance Improvement (PPI) plan is the impetus for ensuring that quality services are provided at Eckerd Connects. This plan focuses on quantitative data and uses qualitative data as an analysis component of performance improvement. Eckerd Connects knows that outcomes are important to our clients, our funders, our communities and our Board.

Eckerd Connects' mission is to provide and share solutions that promote the well-being of children, young adults, and families in need of a second chance. The supporting vision is to ensure that each child and young adult has the opportunity to succeed. With quality programs and services, Eckerd Connects will be able to accomplish our mission and vision. The mission of Eckerd Connects Quality Spoke is to improve client outcomes and the supporting process that achieve them as well as to promote an organizational culture of quality and safety.

Quality is an integral part of the organization's values: We embrace perpetual performance improvement, innovation, and creativity, hold ourselves accountable for achieving outcomes, and strive for excellence in all endeavors. The Organizational Perpetual Performance Improvement Committee (OPPI), chaired by the Chief Strategy and Performance Officer, is a cross functional team comprised of Senior Operations and Spoke Leadership. The OPPI committee collaborates with all Eckerd Connects services, programs and departments to achieve outcomes based on best practices and regulatory obligations, including licensing, contracts, agreements, legal entities, and accreditations. The entire organization is accountable for the data and outcomes, including but not limited to; the daily collection and entry of data, interactions with consumers and stakeholders, and any actions necessary to successfully meet the organization's mission and vision.

### **Purpose and Charter**

The purpose of the Master Perpetual Performance Improvement Plan is to ensure that leadership at all levels of the organization have a system's approach to ensuring that the organization performs in a manner that promotes organizational strength across all functional areas: Quality, Finance, Personnel, External Relations, and Growth and Transformation.

The Master Perpetual Performance Improvement Plan is a culmination of retrospective analysis, research, cross-functional team guidance, and preferred practices. The results of this plan will be used to implement and improve policy and practice.

### Goals

The PPI plan supports the following organizational goals:

- Quality: Hold ourselves accountable for achieving superior outcomes
- Staff: Engage people from a strength-based perspective
- Finance: Be good financial stewards
- External Relations: Build strong and lasting relationships
- Growth and Transformation/Operations: Have the courage to innovate and change

# Perpetual Performance Improvement Process – Developing Operating Plans and Balanced Scorecard

The PPI process begins with a review of Eckerd Connects Strategic Plan and current year performance. This analysis, led by the Chief Performance & Quality Officer with participation from members of the Eckerd Connects' Executive Management Team, results in the development and publication of the Eckerd Connects End of Year Report and Next Year's Operating Plan. This Plan outlines notable current year accomplishments, documents the current year's performance against targets, sets performance targets for the upcoming operating year, and identifies the execution paths for each Eckerd Connects Spoke that will be pursued to achieve targets while advancing the execution of the Strategic Plan.

This process is also informed by the Board of Directors who adopts an annual Eckerd Connects Balanced Scorecard. Balanced Scorecards are also prepared for the Eckerd Connects Community Alternatives-Circuit 6 and Circuit 13 Boards, which are subcommittees of the larger Eckerd Connects Board. This process results in the development and adoption of each of the Spoke's Performance Scorecards. This Scorecard sets performance targets for each of the five major operating responsibilities within that Spoke.

Upon completion of the Eckerd Connects Operating Plan for the upcoming year, Eckerd Connects Quality Spoke, led by the Chief Performance & Quality Officer and Vice President, Innovation and Data, with the assistance of the Director of Innovation, Programs and Eckerd Connects Data and Reporting Unit, produce draft Balanced Scorecard for each of Eckerd Connects' Programs and Networks. After all draft Scorecards are complete, the Organizational Committee meets, and all Spokes verify that their measures are accurately reflected on each program Scorecard. These Balanced Scorecards are then used by Program and Operations Leadership to produce an Annual Operating Plan for each program.

During calls between Quality and Operations Leaderships, the performance measures and contractual or Board targets are reviewed and agreed upon. These Operating Plans and the Balanced Scorecard they contain, form the basis for reporting and reviewing the performance of every Eckerd Connects' program.

These performance targets are also used to develop *Annual Staff Performance Goals* that are entered into the Eckerd Connects' staff development system and serve as the basis for how staff performance is evaluated.

# Perpetual Performance Improvement Process – Monthly Performance Reviews and Reporting

Weekly, each Eckerd Connects program and each Spoke Chief is required to have a Leadership Team Meeting the purpose of which is to review the status of Program/Spoke priorities, initiatives, improvement plans, etc. Additionally, each Program Leader and Spoke Chief holds a weekly "one on one" staff supervision meeting with their direct reports to discuss the status of performance and development goals. The Monthly PPI process builds on this significant base of leader supervision.

The organizational perpetual performance improvement process consists of many functions and is designed to ensure quality and performance initiatives are effectively identified, reviewed, addressed and reported. Site specific and departmental perpetual performance improvement teams will meet in accordance with <u>Eckerd Connects policy A4.01</u>, <u>Perpetual</u> <u>Performance Improvement Committees</u> and will provide Monthly Program PPI Status reports and related documents, as per policy. Regional leadership will review all program reports from their areas of responsibility monthly and ensure they are posted on Eckerdnet.

By the 15<sup>th</sup> of each month, the Eckerd Connects Data and Reporting Unit posts on Eckerdnet each program's Balanced Scorecard performance for the prior month. Each Spoke's Performance Scorecard are also posted at this time.

Within five business days of the Scorecard being posted, each program holds a Monthly Program PPI Meeting which may substitute for the required Leadership Team Meeting. At the Monthly Program PPI Meeting, staff reviews their prior month performance to include the status of any program developed improvement plans and prepares their Monthly Program PPI Status Report. This Report is forwarded to the respective Operations Directors and posted on Eckerdnet next to their scorecard.

Within five business days of the Spoke Scorecard being posted, each Spoke holds a Monthly Spoke PPI Meeting which can function as that week's Leadership Team Meeting. This meeting is used to review performance from the prior month, determine the impact of any prior corrective actions and develop new action steps to address performance issues if necessary. The results of this meeting are incorporated into the next Weekly Spoke Goals status report provided to the Eckerd Connects Chief Performance & Quality Officer.

Within five business days of the posting of the Program Monthly PPI Status Reports, Operations Directors from across Eckerd Connects programs, each of Eckerd Connects Spoke's Designee, led by the Director of Quality Improvement, hold the Monthly Organizational PPI Committee Meeting. The purpose of this meeting is to:

- Review the Program Monthly PPI Status Reports to ensure that each program's plan(s) to correct or prevent performance deficiencies are adequate and have a high likelihood of success.
- Identify any assistance or resources the programs may need from the Support Center to improve their operations.
- Finally, should this review determine that a program requires intensive assistance to solve a specific performance issue, the Committee recommends to Eckerd Connects Chief Performance & Quality Officer that any program that requires intensive Executivelevel assistance to resolve a specific performance issue be added to the Eckerd Connects Weekly Performance & Quality Review Meeting Agenda.

The Organizational PPI Committee then prepares a report which is submitted to the Eckerd Connects Executive Leadership Team. Eckerd Connects Chief Performance & Quality Officer then uses the information from this report to produce the Monthly Eckerd Connects Execution Status Report and the President's Report that goes to the Board of Directors prior to every meeting.

The Chief Performance & Quality Officer holds weekly Performance & Quality Meeting(s). Eckerd Connects Executive Operations Leadership along with the impacted Program Leadership attends these meetings supported by other Chief Executives from the other Eckerd Connects Spokes as required. This Meeting focuses on programs and performance indicators that require Executive attention and course correction to reach require performance levels. Programs remain on these weekly meetings until such time as they can demonstrate consistent satisfactory performance on the outcomes that brought them to Executive management's attention.

## Perpetual Performance Improvement Process - Support and Assistance

Eckerd Connects Quality Spoke along with the Eckerd Connects Organizational PPI Committee facilitates improvement efforts within Programs through the following activities:

- The QI Specialists review Scorecard to identify any trends and contact the Programs to determine if assistance is needed.
- Programs are reviewed in the Performance and Quality Committee for monthly tracking of poor performance and assessment of any need for assistance.
- Direct assistance is provided, as available, through the deployment of competencybased support teams from the Support Center and other services/programs; this may also include internal and external resources, as appropriate. Ongoing assistance, as available, is provided as deemed necessary and/or upon request.

### Communication and Responsibilities

<u>External Stakeholders</u> request and review information about Eckerd Connects services. The stakeholders' analysis of that information is used to support recommendations and make decisions regarding legal, funding, contractual, and licensing matters. Stakeholders also provide Eckerd Connects with expertise, knowledge, and skills utilized to enhance performance and quality of service. A stakeholder is defined as a person, group or organization that has a vested interest in the services provided by the organization. Examples are clients, employees, consumers, funding organizations, referral organizations, venders and governmental bodies.

The <u>Board of Directors</u> will routinely receive and additionally may request information regarding Eckerd Connects data and outcomes from the following Board sub-committees:

- o Performance Improvement Committee
- Fund Development
- o External Relations
- Finance

These committees focus on continuous perpetual performance improvement for all levels of the organization. The Board of Directors may then communicate information pertaining to the organization's outcomes to external entities. The <u>Executive Leadership Team (ELT)</u> has responsibility for all performance and perpetual performance improvement activities organizationally as well as within their respective divisions (Spokes). The ELT evaluates data based on the results of perpetual performance improvement activities and the organizational scorecard. The ELT also responds to Board recommendations and feedback regarding performance and quality improvement.

The Performance and Perpetual Performance Improvement function, under the leadership of the Eckerd Connects' Chief Performance & Quality Officer collaborates with all programs and Spokes and oversees the internal program review process, collects, aggregates and analyzes organizational data and produces reports.

An <u>Organizational Perpetual Performance Improvement Committee</u> (OPPI) consisting of Senior OPS/Spokes leadership convenes on a monthly basis to review and evaluate the monthly program Scorecard via the Monthly Organizational PPI Status Report. The team members are a cross-functional group of problem-solvers designated to recommend change to support the organization's direction. A Safety Committee works collaboratively with the Organizational PPI Committee to ensure continuity and a culture of quality. The Organizational PPI Committee also ensures coordination of the collection, aggregation, and analysis of organizational data and the production of Executive Reports.

The <u>Senior Directors of Growth and Transformation</u> are the organizational experts coordinating perpetual performance improvement activities within their programs. They are responsible for communicating and collaborating throughout the organization. Senior Directors of Growth and Transformation use data to measure and improve performance, establish benchmarks (e.g. targets), monitor operations, and make decisions and recommendations for the practitioner, programs/services, and organization. They review reports, evaluate and analyze data, interpret findings, manage the data collection process, and take action regarding missing data. They have oversight responsibilities for ensuring that internal and external action plans are written, implemented, and monitored for outcomes. The Senior Directors of Growth and Transformation provide and ensure guidance to programs for understanding data and ensuring that data collectors are trained. Additionally, they approve the ongoing perpetual performance improvement activities, identified in policy <u>A4.01 Perpetual Performance Improvement</u> <u>Committees</u> that are implemented by programs to assure that they are valid and supportive of the organization's direction.

The <u>Program/Service and Spoke Leadership</u> members are recognized as the localized/subjectmatter experts coordinating perpetual performance improvement activities within their services/programs/departments. Leadership is accountable for knowledge of quality requirements pertaining to contracts, accreditation, licensing, funding, and organizational policies and procedures. They are also responsible for communicating initially within their specific area and collaborating throughout the organization, as relevant. Leadership uses data to measure and improve performance, establish benchmarks (e.g. targets), monitor operations, and to make decisions and recommendations for the practitioner, programs, and organization. Leadership members review reports, evaluate and analyze data, interpret findings, manage the data collection process, including the identification of responsible personnel and appropriate resources, and have knowledge of and take action regarding missing data. They are responsible for writing, implementing, and monitoring outcomes of internal and external action plans. Leadership provides and ensures guidance to staff for understanding data and ensuring that data collectors are trained. Leadership is also responsible for identifying and initiating creative performance improvement solutions based on this data.

The <u>PPI Committees</u> and <u>Safety Teams</u> are established and operate in accordance with Eckerd Connects policies and procedures <u>A4.01</u>. <u>Perpetual Performance Improvement</u> <u>Committees</u> and <u>D2.11</u>. <u>Safety Teams</u>. These committees are inter-related programmatically as well as within the organization and as such may share minutes or collaborate when topics are relevant.

Reports: (examples: E-Bytes, program data sheets, Performance Enhancement Reviews) are used to meet the requirements of regulatory entities, identify outcomes and trends, communicate to stakeholders, document the effectiveness of the process, and drive to improve performance. The reporting formats and timeframes are defined and determined by the needs of the requesting entity.

Raw data is collected by programs and departments. It is used for aggregation, analysis, and reporting. It may also be used for comparison with external source data. Data must be collected in a timely and accurate manner. (Reference <u>Eckerd Connects Policy A4.02</u>. <u>Data</u> <u>Collection. Reporting and Analysis</u>)

## **Eckerd Connects Organizational Processes**

Leadership teams are charged with the responsibility of leading divisions, departments, and services/programs in perpetual performance improvement and of assuring compliance of the process. Each program, service and Support Center department will develop a Perpetual Performance Improvement process that minimally includes:

- Monthly and weekly reporting (i.e., expense tracking, performance improvement plans, weekly supervision, client chart review, etc.)
- Development and review of annual goals that reflect and support the organizational strategic plan, organizational initiatives, and key performance indicators
- Adherence to the requirements of Eckerd Connects policies and procedures:
  - A4.01. Perpetual Performance Improvement Committees
  - o D2.11. Safety Teams
- Generate and review of data reports against benchmarks
- Gather and analyze information from stakeholders
- Develop action plans for improvement and/or build in efficiencies

Additionally, all divisions, departments, programs and services are encouraged to recognize their employees and each other for quality successes. A toolbox of supporting performance enhancement improvement documents, form templates, etc. is compiled and accessible to the organization.

Evaluation is predicated upon pre-determined thresholds and organizational adopted policies and procedures which are based on industry-preferred practices, contract, licensing and accreditation standards, state and federal laws, budgetary procedures and audited accounting measures. Quality is evaluated within the organization through the following venues:

- The Balanced Scorecard of Key Performance Indicators (KPI)
- o Internal Program Enhancement Reviews (PER) or Focused Compliance Reviews
- o Internal division/department reviews
- External monitoring activities and audits
- Program and department PPI teams as documented in minutes
- Desktop reviews

The Balanced Scorecard is evaluated based on the definition for each key performance indicator. PERs occur based on an established schedule and in collaboration with Operations as to priority assignments. Schedule development is guided by past review results, recommendations from the Operations Directors and senior leadership as to priority assignments and external review schedules. Reviews may be a complete PER which includes review of all standards, a focused review based on targeted standards or desktop/telephonic reviews. During these reviews, program performance is also compared to the previous internal review and the most recent external audit and monitoring reports. Each program and department will conduct Perpetual Performance Improvement Team Meetings in accordance with Eckerd Connects policy and procedure and will incorporate findings from the PER as perpetual performance improvement goals, when appropriate. External activities occur based on the external agencies' notification or schedule.

Data collection is the process of gathering data from various sources, including surveys, interviews, and electronic records. It precedes data measurement and statistical analysis. The collected data is determined by the defined performance measures and desired outcomes. Data is collected in hard copy as well as electronic database systems. The data is aggregated, analyzed and interpreted as described in Eckerd Connects policy <u>A4.06 Organizational</u> <u>Perpetual Performance Improvement Committee.</u> Eckerd Connects leadership continuously monitors the data and uses it to make informed decisions for improvement and to strategize for future planning. Annually, the Organizational Performance Improvement Committee will oversee the review of the Master Perpetual Performance Improvement Plan.

### Lead Agency Specific Activities

Eckerd Connects restructured the leadership within each ECCA to further align with the structure of the Eckerd Connects' Support Center Business Model. Each ECCA is structured with an Executive Director or Vice President of Community Based Care, Associate Executive Director(s), and Five Senior Directors. Each Senior Director is assigned to one of the following spokes; Growth and Transformation, Quality, Staff, External Relations, and Finance. Each circuit is overseen by the Chief of Community Based Care.

In addition to the activities enumerated thus far in the master plan, Eckerd Connects Community Alternatives' (ECCA) lead agency programs perform additional quality management activities. These include, but are not limited to: Data calls, PQI meetings, multiple qualitative review processes, as well as additional activities related to review of stakeholder and client feedback. All members of the review team for each circuit, including the Senior

Director of Quality, Quality Management Supervisor(s), and Quality Management Specialists are required to be certified as QA reviewers by the Department of Children and Families.

- Data Call and Packet: ECCA management teams meet with case management leadership and other community stakeholders to discuss and evaluate the progress made towards meeting statewide performance indicators, locally negotiated contract measures as defined in the lead agency contract, and identified performance improvement initiatives. Statewide performance indicators align with the Federal safety, permanency, and wellbeing indicators. As practice improvements are identified and performance is tracked, root causes are discussed and countermeasures are put in place. Each ECCA has two data packets; one is a public-facing data packet which provides a streamlined synopsis of the system of care differentiated by circuit. The packet is also inclusive of the statewide CBC scorecard and each ECCA's contract performance. The second is for internal use that outlines the above information as well as provides in-depth data pertaining to each measure including children-specific information for those impacting ,the outcome.
- <u>https://eckerd.org/family-children-services/foster-and-adoption/eckerd-connects-community-alternatives-hillsborough/success-metrics/weekly-data-reports/</u>
- <u>https://eckerd.org/family-children-services/foster-and-adoption/eckerd-community-alternatives-pasco-pinellas/success-metrics/weekly-data-reports/</u>

Eckerd Connects Data and Reporting Unit is responsible for obtaining data from Mindshare, FSFN, and the Department's dashboard website to publish the data report prior to the Data Call for ease of access. ECCA executive leadership facilitates the meeting. The process is designed to be iterative, fluid, and flexible to allow for the addition of performance measures at any time depending on the issues impacting the system of care.

#### Case Management Pilot Program

As part of Senate Bill 1326, CMO pilot programs were established in C6 and C13 with a goal of increasing performance in several areas using innovative programs and methodologies. While the specific goals and metrics are still being finalized, some of the expected areas of focus will include: Permanency within 12 months, returns to care within 12 months, placement stability, parent visits, identification and provision of service needs to children, caregivers, and parents, etc. Eckerd Connects has completed a proposal for how to utilize funding, should additional funding be associated with these pilot programs as well.

#### Qualitative Review Processes

• Windows into Practice Case Reviews and Child and Family Service Reviews (CFSR): Eckerd Connects' Quality Management teams (one in each circuit) conduct case reviews utilizing the Windows into Practice Model on a quarterly basis. Each circuit's team consists of 4 Quality Management Specialist with a QM Supervisor overseeing the team. Both teams are overseen by the Senior Director of Quality and Innovation through the Clearwater Support Center. Case samples are selected utilizing a stratified sampling method, as defined by the Department of Children and Families, to ensure that each Case Management Organization (CMO) and all permanency goals are represented. The results of the reviews are analyzed to identify trends, anomalies, areas in need of improvement, and areas of high performance. Analysis includes performance in achieving safety, permanency, and well-being; practice trends; areas of

excellence; and opportunities for improvement.

If, during the course of the reviews, a reviewer notes an administrative or safety concern, a written Request for Action is generated and sent to the CMO responsible for management of the case. The CMO is notified immediately by phone, or in person for safety concerns followed by a written request for action. A formal response is due back to ECCA within two business days for administrative RFAs and one business day for safety RFAs. Each Circuit debriefs the respective reviews with the Case Management staff upon completion. These debriefings are modeled to be informative and flexible allowing for open conversation surrounding case strengths and areas in need of improvement.

- DCF Rapid Safety Feedback Reviews: DCF RSF reviews are completed in accordance with the Windows into Practice Model on a quarterly basis. Each circuit is responsible for 10 reviews per quarter that are selected at random from the stratified sampling method with the required DCF RSF parameters to ensure that all CMO's are represented. These reviews are submitted into the Qualtrics system portal, and data is trended for system analysis. If, during the course of the review, a reviewer notes a safety concern, a staffing is requested with frontline staff, generally within one business day. An action plan is developed jointly with the case management staff for any outstanding safety concerns and is tracked to completion by the Quality Management Specialist.
- Eckerd Rapid Safety Feedback Reviews (ERSF): The ERSF process and safetyfocused tool were developed in the wake of a series of tragedies that occurred under a prior lead agency before Eckerd Connects was awarded the contract for services in Circuit 13 in July of 2012. The population under review are children in-home with a parent under the age of 3. Due to the transition of case management service providers in each circuit, the ERSF population was expanded for the new agencies to 0-5 in order to provide additional oversight and support to staff. Cases are selected based on known fact patterns associated with fatal maltreatment, reviewed based on nine domains of critical thinking including supervision, and staffed generally within one business day to address any safety concerns. In the staffing, concrete action items are jointly developed by the reviewer and the CMO and then monitored to completion by Eckerd Connects' Quality staff. Roll-ups of this data are completed and discussed with leadership from Eckerd Connects and the CMOs on a monthly basis, with a breakdown per agency, per agency unit, and per question. Each question on the tool aids in the identification of systemic issues and trends.
- Discretionary and/or Special Reviews: Discretionary, or special reviews, are conducted by Eckerd Connects' Quality Department or other approved staff upon requested. Requests for discretionary reviews can be made by Executive Management, DCF Administration, or stakeholders. Prior to conducting the review, Eckerd Connects' QM staff determines the purpose of the review in conjunction with the requestor. Results are shared with ECCA leadership and the requesting party. These reviews are child specific and/or topic specific. For example, Eckerd Connects' QM staff has previously completed reviews for missing children, adoption permanency, and abuse reports on open cases.

- Incident Reporting: Completion of an incident report is required by all Eckerd Connects staff and contracted providers when a reportable incident or accident occurs. This provides Eckerd Connects with notice situations or circumstances which may jeopardize the health, safety, or well-being of a child or person receiving services under the supervision of a contracted provider. Entries are made into the state database for those incidents that meet the criteria of reportable incidents. Each circuit has dedicated a position specific to the Incident Reporting process to review a subset of identified incident categories for deep dive trend analysis. The reviewer utilizes the child's file and historical information from previous reports to provide an overall trend summary to ECCA, CMO leadership, and assigned staff.
- Trend Identification and Analysis: Trends are identified through various case reviews on several levels, including CFSR/CQI, ERSF, DCF RSF, Operations reviews, special reviews, Eckerd Permanency Feedback Reviews, and the Eckerd Connects' weekly data packet, etc. Communication of trends is paramount to ongoing quality success. Each ECCA holds leadership and stakeholder meetings that function to develop and evaluate countermeasures for identified trends. ECCA leadership in each circuit meets regularly to discuss emerging systemic trends. Circuit Leadership also meets with the CMO Program Directors on a bi-monthly basis. In Circuit 13, the Senior Director of Quality Management holds a monthly Performance Quality Improvement (PQI) meeting with CMO Directors, Assistant Directors, and Supervisors to discuss performance trends. In C6, this discussion is incorporated into existing Program Director meetings. Evaluation of the effectiveness of countermeasures is done through various file reviews, as indicated above in the identification of the trends, as well as through constant review of data.

### Stakeholder and Client Feedback

- Child Exit Interviews: The ECCA QM Department in each circuit is responsible for the oversight of child exit interviews (feedback). Results are aggregated on a macro level for system improvements. If an issue is identified on the form, the ECCA QM Specialist follows up with the internal licensing department, the Licensing Provider, or the ECCA Contracts Department for follow-up with the residential providers. The results of the interviews are shared with leadership, case management organizations, Licensing, and stakeholders.
- Client Relations Concerns: Eckerd Connects recognizes that clients, family members, parents/guardians and/or other stakeholders may voice concerns to any member of the organization, and believes these concerns and inquiries should be taken seriously and resolved quickly, to the satisfaction of the inquirer whenever possible. ECCA retrieves, returns, and logs Concern Line calls and DCF Trackers within 48 business hours of receipt. ECCA takes a report of the concern. If the call is only an inquiry, the requested information is provided and referrals to community resources are provided to the caller. ECCA sends a Concern Line Referral by email to the Case Management Organization or Licensing Providers for a response. The Case Management Organization or Licensing Providers must then contact the complainant, address their concerns and send an email detailing the follow up to ECCA within 24 business hours. ECCA tracks all responses to DCF Trackers prior to the due date identified by DCF. ECCA tracks all calls for training and evaluative purposes.

#### Subcontractor Expectations

It is Eckerd Connects' expectation that each subcontractor will have its own internal quality management system and processes. All subcontractors are required to identify staff responsible for the outlined activities. The plans shall reflect a system of continuous quality improvement, utilization review, and staff participation in quality improvement, evaluation and internal quality control, corrective action, and remediation. Oversight of the subcontractor Quality Assurance/Quality Improvement Plan will be shared responsibility of the Senior Director of Quality, who will provide technical assistance and strategic direction, and the Contract Department, who will evaluate compliance with the plan through contract monitoring, ensuring Corrective Action Plans are enacted when necessary.

The ECCA Quality team routinely provides performance and quality data to the Eckerd Connects Contracts Division to assist them in the ongoing management of Eckerd Connects ECCA subcontracts in both Circuit 6 and Circuit 13. Additionally, when requested by the Eckerd Connects Contracts Division, ECCA Quality Staff will participate in annual contract monitoring of these subcontractors.

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