



Policy No.: 408

Created: 6/2015

Reviewed: 7/2019

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OVERSIGHT OF CONTRACTED SERVICES

ETHICS & COMPLIANCE DEPARTMENT

SCOPE:

Applies to all Evolution Health colleagues. For purposes of this policy, all references to “colleague” or “colleagues” include temporary, part-time and full-time employees, independent contractors, clinicians, officers and directors.

PURPOSE:

To provide guidance to all Evolution Health (the “Company”) colleagues in order to ensure proper oversight of contracted services.

POLICY:

It is the policy of the Company to ensure proper oversight of contracted services, including documentation requirements for services furnished under arrangement and personnel records.

PROCEDURE:

General Principles

- If the Company is the entity that has assumed responsibility for admitting the patient and developing the plan of care, then the overall responsibility for all services provided by the Company, whether directly through Company employees or through arrangements or contracts with other individuals or organizations, rests with the Company.
- The Company is at all times responsible for ensuring compliance with the Medicare Home Health Agency Conditions of Participation and cannot delegate its administrative and supervisory functions to another home health agency.
- For Medicare patients, the Company must provide at least one service (*i.e.*, skilled nursing, physical therapy, speech language pathology, occupational therapy, medical social services, or home health aide services) directly and in its entirety by employees of the Company.
- The Company must be able to demonstrate:



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1. How it ensures that all professional employees and personnel providing services for the Company have current licenses and registrations;
 2. How it monitors all staff providing services for the Company to ensure that the services provided to patients are within acceptable professional standards for each discipline;
 3. How it monitors the professional skill of all staff providing services for the Company to determine that the skills are appropriate for the care required by the patients the Company admits;
 4. How it monitors all staff providing services for the Company to confirm the care provided is consistent with the plans of care;
 5. How it evaluates whether staff inform the patient of his/her rights prior to the beginning of care or when there are changes in care; and
 6. How coordination of care occurs among all personnel furnishing services to individual patients.
- The Company shall maintain responsibility for the administration, supervision, and delivery of services for its patients.

Services Furnished Under Arrangement or Hourly/Per-Visit Contracts

- Services furnished under arrangement or under hourly or per-visit contracts, must be supported by a written agreement or contract between such personnel or organization and the Company. The written agreement or contract must specify the following:
 1. Patients are accepted for care only by the Company;
 2. The services to be furnished under the agreement or contract;
 3. The necessity to conform to all applicable Company policies, including personnel qualifications;
 4. The responsibility for participating in development of plans of care;
 5. The manner in which services will be controlled, coordinated, and evaluated by the Company;

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6. The procedure for submitting clinical and progress notes, scheduling of visits, periodic patient evaluation; and
7. The procedure for payment for services furnished under the agreement or contract.

POLICY REVIEW

The Ethics & Compliance Department will review and update this Policy and all HIPAA policies when necessary in the normal course of its review of the Ethics & Compliance Program.