

- ISSUE: Providers will ensure the collection and maintenance of client and service information in CIRTS.
- POLICY: The Alliance must ensure that Providers enter all required data per the DOEA Programs & Services Handbook for clients and services in the CIRTS database. The data must be entered into the CIRTS before the Provider submits their request for payment and expenditure reports to the Alliance.
- PURPOSE: The Providers are required to maintain current and accurate client and service information in CIRTS by using the CIRTS reports in the web-based CIRTS database.

PROCEDURE:

- I. In order to ensure CIRTS data accuracy, Providers must run all CIRTS reports listed below monthly, or more often depending on the size of the agency, to verify that client and service data in CIRTS is accurate. All report copies must be saved by the Provider, and provided to the Alliance upon request. Reports may be saved electronically. The Provider must notify any errors identified in the exception reports to the CIRTS Specialist in order to ensure all exceptions are corrected.
- A. All CIRTS reports below must be run monthly (or more often) by all Providers. **All exceptions must be cleared within 2 weeks of running the report.**
1. Assessment Overdue Report (ACTV or ACTV & APCL)
 - a. This report lists all ACTV and APCL clients who have an overdue assessment.
NOTE: Providers must ensure that all active clients have the required annual unduplicated count “0” before running this report. Active clients without an unduplicated count will not be captured in this report. The Provider must run the “Active Client Not Served in a Time Range” reports in CIRTS to ensure all required unduplicated client counts are entered in CIRTS prior to running this report.
 - b. Clients in the overdue assessment report who have been released and are APPL in CIRTS for the LTCC program must not be reassessed by the Provider. The Provider should enter a note in the file indicating “that the annual assessment will be delayed, the individual is being processed for EMS, and that CARES will be doing the initial assessment for SMMC LTC”.
Providers must submit a CIRTS Change/Delete form to the CIRTS Specialist requesting an ownership change for clients still owned but no longer served by the Provider.
 2. Assessment Overdue Report (APCL only)
 - a. This report lists all APCL clients who have an overdue assessment. All clients wait listed for services must be rescreened annually.
 - b. Providers must submit a CIRTS Change/Delete form to the CIRTS Specialist requesting an ownership change for clients still owned but no longer served by the Provider.
 3. Clients Enrolled who have Moved to Another PSA.
 - a. The provider must close the enrollment for any client that has moved to another PSA.

4. Active Clients not Served in a Time Range
 - a. This report shows clients that are active in CIRTS but have no services reported in the specified time range. If a client is no longer receiving services, the Provider must terminate the client enrollment in CIRTS. The Alliance recommends a 3 month grace period, if the client is hospitalized and/or in a rehab. Documentation must be in the file indicating why the client remains open, if services are not being provided.
5. Incomplete Assessment Report
 - a. This report lists all assessments that have been partially saved in CIRTS. The Provider is required to complete and/or delete the assessment identified in this report.
6. Clients Served not Enrolled
 - a. The Provider must not bill services for clients that are not enrolled in CIRTS. If the client is receiving services, an enrollment code, and the required "unduplicated 0 count" must be entered in CIRTS. The unduplicated count must be entered annually within the first month of the new contract year, if the client is still active in the program.
7. Consumer Age Verification Report
 - a. The provider must justify all exceptions identified in this report. Clients under 60 must not be served unless they meet the exception criteria as specified in the DOEA Programs and Services Handbook. Justification and documentation must be kept in the client's file for monitoring purposes. The appropriate code must be entered in CIRTS in order to clear the exception from this report.
8. ACTV CCE, HCE, and ADI, Clients with no Care Plan
 - a. All clients active in CCE, HCE and ADI are required to have annual care plans entered in CIRTS. Clients listed in this report have no initial or annual care plan entered in CIRTS.
9. Duplicate Client Social Security Numbers in CIRTS
 - a. Provider must run this report and correct the records for clients that show active in CIRTS with multiple social security numbers.
 - b. The Providers must request confirmation of the correct social security from the client.
 - c. If a social security number (SSN) error in CIRTS caused a client to be listed, then the Provider must verify accuracy of the SSN, correct CIRTS by moving all client records from the incorrect SSN to the correct SSN and notify the CIRTS Specialist of the error.
 - d. A CIRTS change/delete form must be forwarded to the CIRTS Specialist requesting to delete the incorrect record only after the Provider has transferred the information in CIRTS from the incorrect record to the correct record. The Provider and/or the CIRTS Specialist may need to coordinate the transfer of data with other service providers that may be servicing or served the client.
10. Medicaid Waiver Eligible (CCE Providers Only)
 - a. The Provider must refer all clients identified on this report to the ADRC to wait list for the SMMCLTC program, as per contract and program requirements. Clients

who have been identified as being potentially Medicaid Waiver eligible must be advised of their responsibility to apply for Waiver services as a condition of receiving CCE services.

11. DATA Inconsistencies Found when Comparing Vital Statistics Death Certificates with **CIRTS-Open Enrollments Report**

- a. Verify the client is deceased.
- b. Enter the client's date of death (DOD) on the CIRTS demographics screen.
- c. The Provider must terminate the open enrollment in CIRTS for clients who have died. This includes APCL, APPL and ACTV enrollments. The Provider must enter the enrollment end date as the date of death and the termination code T_CD (client died).
- d. If a social security number (SSN) error in CIRTS caused a client to be listed, then the Provider must verify the accuracy of the SSN and correct CIRTS by transferring all client records from the incorrect SSN to the correct SSN. Once the information has been transferred from the incorrect SSN to the correct SSN, the Provider must send a request to the CIRTS Specialist to delete the incorrect record. Proof of the SSN must be submitted with the request. The CIRTS Specialist must verify that the information has been transferred entirely before requesting to delete the record.
- e. If a Vital Statistics SSN error caused a client to be listed, then the Provider must notify the CIRTS Data Specialist. The Alliance must then notify the DOEA Contract Manager and contact Ken Jones, Deputy State Registrar, Florida Department of Health, Office of Vital Statistics, Post Office Box 210, Jacksonville, FL 32231, (904) 359-6982, Fax (904) 359-6931, Ken.Jones@doh.state.fl.us. The Provider should refer to DOEA's NOI #031408-1-I-SWCBS and CIRTS Data Integrity Policy Clarification, Notice #: NOTICE #:070116-1-I-SWCBS. This report updates daily.

11. DATA Inconsistencies Found when Comparing Vital Statistics Death Certificates with **CIRTS-Assessment after DOD Report**

- a. Verify the client is deceased.
- b. Enter the client's date of death (DOD) on the CIRTS demographics screen.
- c. For assessments reported after DOD, the Provider must submit a request to delete the assessment to the CIRTS Specialist with an explanation indicating how/why an assessment was conducted after the DOD. When the CIRTS Specialist receives the justification from the Provider, the Alliance will delete the assessment record from CIRTS. Copy of the justification must be submitted to the Director of Program Integrity and Accountability.
- d. If a social security number (SSN) error in CIRTS caused a client to be listed, then the Provider must verify accuracy of the SSN, correct CIRTS by moving all client records from the incorrect SSN to the correct SSN. Once the information has been transferred from the incorrect to the correct SSN, the Provider must send a request to the CIRTS Specialist requesting to delete the incorrect record. Proof of the SSN must be submitted with the request.
- e. If a Vital Statistics SSN error caused a client to be listed, then the Provider must notify the CIRTS Data Specialist. The CIRTS Specialist must then notify the DOEA Contract Manager and contact Ken Jones, Deputy State Registrar, Florida Department of Health, Office of Vital Statistics, Post Office Box 210, Jacksonville, FL 32231, (904) 359-6982, Fax (904) 359-6931, Ken.Jones@doh.state.fl.us. The Provider should refer to DOEA's NOI #031408-1-I-SWCBS and CIRTS Data Integrity Policy Clarification, Notice #: NOTICE #:070116-1-I-SWCBS. This report updates daily.

13. DATA Inconsistencies Found when Comparing Vital Statistics Death Certificates with CIRTS-**Services More than 2 months after DOD Report.**
 - a. Verify the client is deceased.
 - b. Enter the client's date of death (DOD) on the CIRTS demographics screen.
 - c. Regarding services reported after DOD, the data should be left in CIRTS if the Department paid for the service. The Provider should confirm that the client is no longer receiving services. The Provider must submit an explanation to the CIRTS Specialist indicating why/how services were provided after DOD. Copy of the justification must be submitted to the Director of Program Integrity and Accountability
 - d. For case management (CM) or case aide (CA), the CIRTS Specialist must ensure that the PSA Case Closure-Billing code is entered in CIRTS. This code means that "Case Closure-Billing" after date of death was appropriate and allowable in order to close the client record. For services other than CM or CA, reported beyond 60 days of the DOD, the Alliance must obtain additional information from the service provider and document any reasons given, but NOT adjust CIRTS service records at this time.
 - e. If a social security number (SSN) error in CIRTS caused a client to be listed, then the Provider must verify accuracy of the SSN, correct CIRTS by moving all client records from the incorrect SSN to the correct SSN. Once the information has been transferred from the incorrect to the correct SSN, the Provider must send a request to the CIRTS Specialist requesting to delete the incorrect record. Proof of the SSN must be submitted with the request.
 - f. If a Vital Statistics SSN error caused a client to be listed, then the Provider must notify the CIRTS Data Specialist. The CIRTS Specialist must then notify the DOEA Contract Manager and contact Ken Jones, Deputy State Registrar, Florida Department of Health, Office of Vital Statistics, Post Office Box 210, Jacksonville, FL 32231, (904) 359-6982, Fax (904) 359-6931, Ken.Jones@doh.state.fl.us. The Provider should refer to DOEA's NOI #031408-1-I-SWCBS and CIRTS Data Integrity Policy Clarification, Notice #: NOTICE #:070116-1-I-SWCBS. This report updates daily.
14. Active MLTC clients who are ACTV, APCL, or APPL in Another Program
 - a. The Provider must contact clients active in MLTC and ACTV in a DOEA funded program.
 - b. The Provider must confirm with the client that they are active in the MLTC program and are receiving services before they terminate the client.
 - c. The Provider must follow grievance procedures prior to service termination.
 - d. The Provider has 30 days from the day the client is active in MLTC to transition services and terminate DOEA funded services.
15. CIRTS Data Clean-up Report
 - a. This report identifies inconsistencies with data reported in CIRTS by Providers. In most situations, it will capture clients who have been terminated as deceased in one program, but still show active in another.
 - b. The Provider must verify that the client is not deceased. If they are, the record must be closed. If they are not, the Provider must notify the CIRTS Specialist of the incorrect data entry which is causing the exception. The CIRTS Specialist will work with the Provider who entered the incorrect code in order to clear the exception. The Provider must address all exceptions captured in this report. This report captures current up-to-date information and shows exceptions immediately after they are entered in CIRTS.

16. Active PACE Clients who are ACTV, APCL, or APPL with other Program
 - a. Providers must give choice to the client between the PACE program and their existing program to clients identified on the report. Clients cannot be dually enrolled in PACE and any other DOEA funded program. All clients must be terminated in CIRTS if choosing to remain in the PACE program. The Provider must follow up accordingly to ensure a resolution is obtained.
- II. The Provider must maintain a master file containing the above information for all CIRTS reports. Reports may be kept electronically.
- III. All the above reports must be available at the time of monitoring or upon request by the Alliance. The following should be the parameters used to ensure that any and all outstanding exceptions are identified:
 - a. Date, when requested, must include 1/1/2008 to current.
 - b. Client status, when requested, must include “all” status (active, waitlist, etc.).
 - c. Must include “Y” to unduplicated counts, when applicable.
- IV. The Alliance’s CIRTS Specialist will review CIRTS reports monthly to ensure exceptions have cleared.
 - a. Monthly emails will be sent to the Providers by the CIRTS Specialist notifying them of pending exceptions. The Providers will be given 2 weeks to clear the exceptions. The CIRTS Specialist will include the Contract Manager and the Director of Program Integrity in the communication with the Provider.
 - b. A second notice/reminder of the pending exceptions will be sent to the Provider by the CIRTS Specialist if the exceptions are still pending after the 2 week period.
 - c. If the Provider fails to correct the exceptions by the second reminder, the Contract Manager will follow up in writing with the Provider to determine if training and/or technical assistance is necessary.
 - d. If the exceptions are not cleared, an email will be sent to the Provider by the Director of Program Integrity and Accountability to determine why the exceptions are still pending.
 - e. All email correspondence with the Provider must be saved electronically by the CIRTS Specialist for DOEA monitoring purposes.
- V. Failure to maintain accurate CIRTS data may result in the following:
 - a. As per the contract, the Provider must ensure CIRTS Data Integrity and must enter all required data following DOEA’s CIRTS policy guidelines for clients and services in CIRTS. Data must be entered into CIRTS before the Provider submits their request for payment.
 - b. The Provider will be given technical assistance by the CIRTS Specialist and/or the Contract Manager if exceptions are not cleared within the required time frame.
 - c. Failure to rectify the noted deficiencies in a timely manner will result in the Provider being asked to submit a Corrective Action Plan (CAP) to address the deficiencies and state how the deficiencies will be remedied within a time period approved by the Contract Manager. As per the contract, the Alliance may assess a Financial Consequence for Non-Compliance on the Provider for each deficiency identified in the CAP which is not corrected pursuant to the CAP. The Alliance may also assess a Financial Consequence for failure to timely submit a CAP.

- d. If the Provider fails to meet the minimum level of service or performance, as defined in the contract, the Alliance may apply financial consequences commensurate with the deficiency. Financial consequences may include but are not limited to contract suspension, refusing payment, withholding payments until deficiency is cured, tendering only partial payments, and/or cancellation of contract and reacquiring services from an alternate source. The Provider must refer to the “Consequences for Noncompliance” section of their contract.