Periodic Oversight of Systems and Methods (POSM)

Sample Local System Manager (LSM) Interview Questions

**Purpose**

The purpose of the POSM LSM interview is to enable DBHDS—as the State Lead Agency (SLA) for implementing Part C of IDEA in Virginia—to better understand and interpret the data and evidence collected through a variety of POSM desk audit activities conducted by SLA staff. Specifically, at the time of the LSM interview, the Part C monitoring team will have:

* Completed a review of selected child and family records.
* Evaluated survey responses from service coordinators and direct service providers.
* Evaluated family survey responses to selected questions that align with POSM protocols.
* Compiled local revenues data in order to inform a discussion about systems of payment and payor of last resort.
* Reviewed local public awareness plans and activities.
* Examined one or more local contracts between the LLA and contracted providers to verify compliance with one or more requirements of the Part C local contract between the SLA and the LLA.

**Process**

POSM activities occur over a 16-week period. The LSM interview will typically be held during week 9 and conducted online via Microsoft Teams. LSMs are welcome to include other members of their staff as they wish. Interviews are initially scheduled for 2 hours. The SLA reserves the right to schedule a follow-up interview if additional time is needed.

The Part C monitoring consultant assigned to the locality will conduct the meeting. Other SLA staff, including the early intervention team leader and other regional Part C monitoring consultants, may also participate.

The interview will consist of two parts. The first part will consist of a series of questions developed to further inform the SLA’s observations and conclusions based on all POSM desk audit activities. The second part will involve a summary of case reviews and findings. Following the interview, the locality will have five (5) business days to provide additional clarification and, if required, documentation related to any case questions or concerns.

**Sample Questions**

The following is a list of sample questions that may be asked during the interview. *This list is not exhaustive.* By necessity, interviews will be individualized for each locality based on questions or concerns arising from the SLA’s POSM desk audit.

**POSM Protocol R1-01: Individualized Supports and Services**

1. How do you ensure that IFSP outcomes clearly connect to child and family assessment information, including family priorities, and provide a foundation for evidence-based service delivery (through coaching and natural learning environment practices)?
2. How do you ensure that IFSP goals and outcomes are functional and measurable?
3. How do you ensure that IFSP services appear reasonable in order to meet the needs of the child and family and achieve identified outcomes?
4. We asked your team to estimate what percentage of IFSPs contain individualized service coordination outcomes. What would you estimate this percentage to be?

**POSM Protocol R1-02: Service Delivery**

1. Assume an IFSP has just been signed:
   1. What is your process for assigning a case to a service provider, and how quickly is this process initiated after the service is added to the IFSP?
   2. What are the expectations for how quickly an initial contact is made with families to schedule initial visits?

**POSM Protocol R1-03: Public Awareness and Child Find**

1. Do you have written procedures that specify who is responsible for coordinating public awareness and child find activities and what those specific responsibilities include?
2. Are records maintained of each child find activity, including who/what/when/where/how?
3. What are your internal procedures for following up on each referral?
   1. How quickly are referrals acted upon?
   2. Who is responsible for acting upon referrals?
   3. How are response timelines monitored?
   4. How many attempts are made to follow-up on a referral before it is closed?

**POSM Protocol R1-04: Family Rights and Procedural Safeguards**

1. How are families made aware of their dispute resolution rights?
2. *Question 10 to be personalized to the locality based on family survey and provider survey results.*

**POSM Protocol R1-06: System of Payments (SOP) and Payor of Last Resort (POLR)**

1. What is your process to verify your monthly billing from contract providers supports payor of last resort (EOBs, family fee billing)?
2. What is your process for resubmitting denied insurance claims?
3. What is your process for back billing services for children with lapsed Medicaid coverage whose coverage is restored to a retroactive date?
4. How do you encourage providers to ask about insurance changes during their visits and share changes with the local system?
5. How do you ensure your state and federal allocations funds are used as payor of last resort?
6. What is your process for determining who is billing the family fee and the billing is accurate?
7. How do you ensure that Part C federal funds are kept separate from other federal funds? (Is there a designated fund code?)

**POSM Protocol R1-07: Medicaid Verification**

1. Assume that a family has given permission to your local system to check monthly for Medicaid coverage. What happens once this permission is received?

**POSM Protocol R1-08: Local Self-Monitoring**

1. What is your process for general supervision and oversight of staff?
2. What is your process for general supervision and oversight of contract providers?
3. How often are procedural safeguards reviewed to ensure that they are accurate and complete?
4. How do you ensure contracted agencies and individual providers are complying with the local provider contract?
5. How do you use TRAC-IT reports to support your local monitoring?
6. Other than TRAC-IT reports, what are your local monitoring processes and how are they implemented?