

Compliance Management

Vocational Firm Quality Assurance

What is compliance management?

Compliance Management is the process L&I's Quality Assurance (QA) team uses to help vocational firms return to compliance when requirements are not met. Two common types of compliance issues that firms may need to address are administrative issues and service delivery issues. The QA team documents compliance issues at any time during the QA validation process.

Administrative issues

Administrative issues typically involve the procedural requirements in the QA validation process. Common examples of administrative issues include, but are not limited to:

- Sending monthly QA data late or not at all.
- Providing required documents late or not at all.
- Missing or rescheduling validation meetings repeatedly.
- Not responding to L&I's communication attempts.

The QA team will send a reminder to the firm when they document an administrative issue. If the firm does not respond or provide the required information after two reminders, the QA team will send a certified letter. The certified letter is a "Notice" to the firm. The firm is required to respond within 10 business days after receiving the letter. If the firm does not respond, L&I will begin the suspension process.

Order 1: Suspension of Vocational Recovery (VR) referrals

L&I will send a suspension order with a letter of explanation to the firm. The firm will no longer receive new VR referrals. The firm will continue to provide services on:

- Current VR referrals.
- Re-referred VR referrals because of reaching the fee cap.
- VR referrals initiated on tie-in claims.
- All other referral types.

The order becomes final after 60 days. During this time, the firm can contact the QA team who can clarify expectations, answer questions, and provide assistance as needed.

How to return to compliance after Suspension Order 1

A firm may return to compliance by completing the tasks outlined in the letter of explanation. The QA team determines if a firm returns to compliance. The QA team may lift the suspension once they verify the administrative issue has resolved.

Order 2: Suspension of all referral types and removal as an L&I provider

If the administrative issue is unresolved 60 calendar days after the firm receives Suspension Order 1, L&I sends a second suspension order with a letter of explanation to the firm. The firm will no longer receive referrals of any type and all existing referrals will be transferred to other firms.

Once all referrals are transferred:

- All vocational rehabilitation counselors (VRCs) are detached from branches and services locations.
- Branches and services locations are closed.
- All VRCs provider numbers with the firm are inactivated.
- The firm's provider number is inactivated.

If the administrative issue is unresolved 60 days after the firm receives Suspension Order 2, the order becomes final and the firm is removed as an L&I provider.

Service delivery issues

Service delivery issues are documented when L&I is unable to verify if vocational services provided by the firm are in alignment with QA elements and WAC requirements. The QA team documents service delivery issues during the firm's validation review. The firm and QA team discuss service delivery issues at the scheduled validation meeting.

If the service delivery issue is significant, the QA team will:

- Place an action item on the firm's addendum.
- Consult with the firm to help them develop their plan to resolve the service delivery issue.
- Meet with the firm to monitor and assess improvements.
- Include addendum language concerning the potential of suspension at the next review.
- Issue a suspension order if improvement is not clearly demonstrated in accordance with the prior addendum

Suspension Order 1: Suspension of Vocational Recovery (VR) referrals

L&I will send a suspension order with a letter of explanation to the firm. The firm will no longer receive new VR referrals. The firm will continue to provide services on:

- Current VR referrals.
- Re-referred VR referrals because of reaching the fee cap.
- VR referrals initiated on tie-in claims.
- All other referral types.

The order becomes final after 60 calendar days. During this time, the firm can contact the QA team who can clarify expectations, answer questions, and provide assistance as needed.

How to return to compliance after Suspension Order 1

A firm may return to compliance by completing the tasks outlined in the letter of explanation. The QA team may lift the suspension once they are able to verify vocational services are in alignment with QA elements and WAC requirements. Suspension duration may vary.

Suspension Order 1 will remain in effect until:

- The QA team lifts Suspension Order 1 because the firm returns to compliance; OR
- The QA team takes further action by issuing Suspension Order 2.

Suspension Order 2: Suspension of all referral types

L&I sends a second suspension order with a letter of explanation to the firm. The firm will no longer receive referrals of any type and all existing referrals will be transferred to other firms.

60 calendar days after the firm receives Suspension Order 2, the order becomes final and the firm is removed as an L&I provider.

Removal as an L&I provider

When a firm is removed as an L&I provider:

- All referrals are transferred to other firms.
- All vocational rehabilitation counselors (VRCs) are detached from branches and services locations.
- All VRCs provider numbers with the firm are inactivated.
- Branches and services locations are closed.
- The firm's provider number is inactivated.

L&I wants each firm to be successful and understands circumstances can be complex and unique. The QA team documents compliance issues at any time during the validation process and provides firms with instructions on how to return to compliance.