

## **Complete Ophthalmic Services CIC: Managing Subcontractor Performance**

### **1. Definitions**

The following definitions will apply in this document:

Complete Ophthalmic Services CIC will be known as "the Company"

A practice providing community services will be known as "the subcontractor"

The Clinical Commissioning Group(s) commissioning services from the Company will be known as 'the commissioner'

### **2. Introduction**

It is the Company's responsibility to manage the subcontractors involved in undertaking community services. This Standard Operating Procedure explains how the Company will manage its subcontractors' performance, and ensure that the commissioner's requirements will be fully met at all times.

The Clinical Governance and Directors will be responsible for the monitoring of all clinical governance and quality assurance arrangements including dealing with complaints and monitoring and managing the performance of the network of optical practice subcontractors in line with the Company's Standard Operating Procedure. This includes:

- Analysing subcontractor performance reports on a monthly basis to identify optical practices that require performance management intervention.
- Implementation of the appropriate performance management measures.
- Addressing training needs and implementing any training.
- Designing communications to subcontractors e.g. monthly news bulletin.

The contract between the Company and the subcontractor will set out the subcontractor's responsibilities in managing the optometrists providing the service and ensuring that the commissioner's requirements are fully met at all times.

Any performance shortfalls and/or complaints identified with the subcontractor will be resolved by the Company.

The commissioner will be made aware of any performance shortfall that results in the suspension or termination of a subcontractor's contract by the Company.

Any issues identified will be resolved promptly and efficiently to ensure minimal impact to service delivery.

The Company's Serious Incidents and Complaints policies may operate alongside this policy as necessary.

Performance monitoring of subcontractors enables the Company to make continuous improvements to its service delivery in driving patient outcomes. The Company holds a separate Quality and Continuous Improvement Policy which incorporates subcontractor monitoring.

### 3. Key Performance Indicators

Key Performance Indicators (KPIs) as set by the commissioner will be recorded via the OptoManager IT platform, provided by Webstar Health, for each subcontractor on a monthly basis. Webstar Health is a well-established company based in England and is a registered data processor with the ICO. Webstar Health meets the requirements of the NHS Information Governance Toolkit Level 2. It provides similar systems for pharmacy, optometry and general medical services to NHS organisations in England. The KPIs will be set specific to each contract but an example is given below for illustration purposes:

Subcontractor [insert practice name]	
Total number of new appointments attended	
Total number of follow up appointments attended	
Total number Of DNAs (from GP referrals)	
Total number Of DNAs (from self referrals)	
Total number of onward referrals to secondary care	
Total number of referrals triaged within specified time (as per contract)	
Total number of patients seen within specified time - urgent (as per contract)	
Total number of patients seen within specified time – non urgent (as per contract)	
Total number of complaints	
Patient survey results	

#### 4. Identifying Poor Performance

Key Performance Indicators (KPIs) as set by the commissioner will be analysed per subcontractor on a monthly basis to identify outliers and poor performance. The KPIs will be set specific to each contract but an example is given below for illustration purposes:

<i>Performance Indicator</i>	<i>Actual</i>	<i>Percentage of total reports submitted</i>	<i>Target Percentage of total reports submitted</i>	<i>Average Percentage of total reports submitted (all contractors)</i>
Number of onward referrals to secondary care				
Number of patients triaged within specified time				
Number of patients seen within specified time - urgent				
Number of patients seen within specified time – non urgent				
Number of complaints				
Number of patients satisfied with service				

#### 5. Managing Poor Performance

When a specific performance concern has been identified within the service provided by a subcontractor, the Clinical Governance and Directors will investigate the concerns.

Examples of performance concerns that would require investigation are:

- A subcontractor appearing to refer a very high number (or low number) of patients onto the hospital.
- The hospital has raised concerns about the quality of onward referrals from a subcontractor.
- A subcontractor has a high rate of follow up appointments.
- A subcontractor is recommending unnecessary PEARS appointments when a routine sight test would be appropriate.
- A subcontractor is not seeing patients within the specified timescales.
- Poor levels of patient satisfaction reported in patient surveys.

Where significant outliers are identified from an audit, or as a result of other evidence e.g. secondary care complaint, a random selection of patient records will be reviewed by the Clinical Governance and Directors to determine the appropriateness of the clinical decision making across the entire patient pathway. This will also demonstrate whether clinical protocols are being adhered to and assess record keeping.

Where concerns about the quality of service provided by a subcontractor are raised, patient survey results, complaints and other appropriate evidence will be analysed to establish where the concerns are justified.

The Clinical Governance and Directors will manage under-performing subcontractors using a five stage breach process to ensure that the commissioner's requirements are fully met at all times. The Company will share learning that results from the management of subcontractor performance with all subcontractors in order to maximise the quality of the service and achieve continuous improvement.

### **Five Stage Breach Process for the Management of Subcontractor Performance**

	<i><b>Incident</b></i>	<i><b>Action by the Company</b></i>	<i><b>Commissioner notified</b></i>
<b>Breach 1</b>	First performance incident	The clinical governance lead and directors will contact the subcontractor to discuss and highlight KPIs. He will direct the contractor to revisit the clinical and administrative protocols and guidelines as appropriate.  Breach letter 1 issued.  Subcontractor to confirm in writing that any remedial action required will be taken.	N
<b>Breach 2</b>	Second performance incident	The clinical governance lead and directors will arrange training or mentoring visit with the subcontractor and a peer discussion session if appropriate.  Breach letter 2 issued.  Subcontractor to confirm in writing that any remedial action required will be taken and provide evidence of such to the clinical governance and performance lead within 4 weeks.	N
<b>Breach 3</b>	Third performance concern in 12 month period	The clinical governance lead and directors will arrange a training visit with the subcontractor, and a peer discussion session if appropriate.  Breach letter 3 issued.	N

		Subcontractor to confirm in writing that any remedial action required will be taken and provide evidence of such to the clinical governance and performance lead within 4 weeks.	
<b>Breach 4</b>	Fourth performance concern in 12 month period	<p>Contract Suspension Letter issued.</p> <p>Practice removed temporarily from list of optometrists provided to patients.</p> <p>Patients in progress directed to alternative practices. The clinical governance and performance lead will arrange a training visit with the subcontractor, and a peer discussion session if appropriate.</p> <p>Demonstration of subcontractor and optometrist competence required before contract can be reinstated.</p> <p>If competence cannot be demonstrated a Contract Termination Letter will be issued.</p>	Y
<b>Breach 5</b>	First performance concern in 6 month period following reinstatement of contract following a period of suspension	<p>Contract Termination Letter issued.</p> <p>Practice removed permanently from list of optometrists provided to patients.</p> <p>Patients in progress directed to alternative practices.</p>	Y

The Company's Managing Subcontractor Performance document will be reviewed annually with commencement date March 2014.