

**Pathways Community HUB Certification Program
Pathways Agency Standards – Updated July 2021**

Standard #1 - The Pathways Agency (PA) is an independent legal entity or an affiliated component of a legal entity.

Background/Rationale

The Pathways Agency (PA) is a legal entity that has legal capacity to enter into agreements or contracts, assume obligations, incur and pay debts, sue and be sued, and to be held responsible for its actions. The PCH can be an association, corporation, partnership, proprietorship, or trust that has legal standing in the eyes of the law.

Review Items to Achieve Standard #1

- A. Copy of most recent IRS Form 990; and
- B. Copy of IRS Determination letter with Tax Identification Number/Employer Identification Number (EIN); and
- C. Dun & Bradstreet Number.

Standard #2 – The Pathways Agency attests that it supports the development of a Certified Pathways Community HUB (PCH).

Background/Rationale

Developing a Pathways Agency within a community or region can be an important first step to improving community-based care coordination. The Pathways Agency commits to working with community partners on the future development of a Certified Pathways Community HUB. Once the PCH is operational and applying for certification, the Pathways Agency Certification will be withdrawn within six months.

Review Items to Achieve Standard #2

Attestation form (**Appendix B**) signed by the director of the Pathways Agency.

Standard #3 – The Pathways Agency is based in the community and/or region it serves and confirms that it is not within the service area of an existing Certified Pathways Community HUB or a PCH applying for certification.

Background/Rationale

The Pathways Agency must build strong relationships with community partners in order to receive referrals and connect participants to services. The Pathways Agency office and staff must be located within the community and/or region it serves.

Review Items to Achieve Standard #3

- A. Physical address of the Pathways Agency; and
- B. Description of the Pathways Agency service area (census tracts, zip codes, city, county, region); and
- C. Description of the service area covered by each Certified Pathways Community HUB in the region. Pathways Agencies within the catchment area of a Certified Pathways Community HUB or PCH applying for certification are required to join the PCH network as a contracted Care Coordination Agency (CCA).

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Standard #4 - The Pathways Agency uses Standard Pathways and has been operating for a minimum of 3 months.

Background/Rationale

Each Standard Pathway, when completed, represents a specific individually modifiable risk factor that has been identified and addressed. The use of Standard Pathways attracts payers that are interested in funding evidence-based models of community-based care coordination. Additionally, using Standard Pathways allows for further research, evaluation, analysis, and improvement of the model. The Pathways Agency is beyond the planning phases of development and has utilized the Standard Pathways for a minimum of 3 months.

Review Items to Achieve Standard #4

- A. Confirmation that the Pathways Agency can implement all current Standard Pathways (**Appendix A**). PA will need to present paper documentation or database screenshots that confirm all current Standard Pathways are available to care coordinators and Pathways are used as needed (representative of the population being served).
- B. Documentation shows that Standard Pathways have been used for a minimum of 3 months.

Standard #5 – All Pathways Agency staff receive training on Pathways.

Background/Rationale

The Pathways model focuses on identifying and engaging at-risk individuals, documenting modifiable risk factors, and addressing those risk factors in a pay for performance, outcome-focused approach. Program, administrative, and financial personnel must understand Pathways and an overview of the Pathways Community HUB model. PCHI has developed training on the Pathways Community HUB model that is available to Pathways Agencies applying for certification.

Review Items to Achieve Standard #5

- A. Documentation of approved PCHI training provided for all Pathways Agency staff on Pathways and the Pathways Community HUB approach; and
- B. Documentation that all new staff receive comprehensive training about Pathways and the Pathways Community HUB model within 30 days of hire and with updates as needed.

Standard #6 – The Pathways Agency monitors the caseloads of care coordinators.

Background/Rationale

The Pathways Agency should demonstrate its resourcefulness and benefit to the community by having the capacity to provide services to a reasonable caseload that reflects its efficiency and effectiveness in connecting at-risk populations to appropriate health, behavioral health, and social services.

Review Items to Achieve Standard #6

- A. Description of how caseloads are determined for full-time and part-time community care coordinators/community health workers (CHWs).

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1. Pathways Agency’s policy for reviewing and analyzing caseloads; and
 2. Pathways Agency’s plan for caseload correction.
- B. Documentation that all active community care coordinators/CHWs working are dedicated at least 0.5 FTE to Pathways Agency work.

Standard #7 - The Pathways Agency complies with the Health Insurance Portability and Accountability Act (HIPAA).

Background/Rationale

Ensuring strong privacy protections is critical to maintaining individuals’ trust in their medical, behavioral health, and oral health providers, and their willingness to obtain needed services. At the same time, circumstances arise where information may need to be shared to ensure individuals receive the best services. Therefore, all those working with the Pathways Agency must comply with the Health Insurance Portability and Accountability Act (HIPAA).

Review Items to Achieve Standard #7

- A. HIPAA protection policies in the Pathways Agency’s operations manual; and
- B. Signed HIPAA compliant agreements between the Pathways Agency, service providers, and others; and
- C. Documentation that all Pathways Agency personnel receive and complete HIPAA training upon hire, and annually thereafter. Examples of acceptable documentation could include a list of personnel who have completed the training and/or copies of certificates of training completion.

Standard #8 – The Pathways Agency is committed to continual quality improvement and has a written Quality Improvement Plan.

Background/Rationale

The Pathways Agency is responsible for monitoring and improving the quality of community-based care coordination services provided to those who are at risk. Therefore, the Pathways Agency must have a Quality Improvement Plan and regularly evaluate services.

Review Items to Achieve Standard #8

- A. Copy of the Pathways Agency’s Quality Improvement (QI) Plan, that includes, but is not limited to:
 1. Description of how QI projects are selected, managed, and monitored; and
 2. Description of quality methodology (such as PDSA, Six Sigma) and quality tools/techniques to be utilized; and
 3. Documentation of who is responsible for conducting QI reviews; and
 4. Frequency of QI reviews; and
 5. Description of how the Pathways Agency uses QI findings to improve the quality of community-based care coordination services provided to those who are at risk.
- B. Documentation of quality improvement reviews that have been completed over the past year.
- C. Documentation of how identified quality improvement opportunities add to or change

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existing policy.

- D. Documentation that staff receive training and/or resources based on quality improvement recommendations. Provide written documentation of trainings and attendance sheets from trainings.

Standard #9 – The Pathways Agency is committed to continual quality improvement and has a written manual outlining all policies and procedures.

Rationale/Background

The Pathways Agency is committed to continual quality improvement to assure that community members are receiving the highest quality community-based care coordination services. All policies and procedures must be written and shared with agency staff. The operations manual must be updated annually, at a minimum.

Review Items to Achieve Standard #9

- A. Description of Pathways Agency’s mission, program goals, and objectives.
- B. Referral Policies and Procedures, that include at a minimum:
1. How referrals are provided in a HIPAA compliant way (electronically, phone call, etc.); and
 2. Number of documented attempts to reach the participant; and
 3. Document strategies used by the community care coordinator/CHW to reach the participant (e.g., phone, mail, secure email, secure texting, home visit); and
 4. Document number of days participant is expected to be contacted from receipt of referral; and
 5. Document the specific time frame and process for communicating outcome of the referral back to the referral source.
- C. Policies and procedures addressing home visits that include at a minimum:
1. Document community care coordinator/CHW home visiting frequency expectation (minimum monthly); and
 2. How attempted visits are documented; and
 3. How contacts between visits are documented; and
 4. Document expectation that 75 percent of overall visits should occur in participants’ homes or at minimum, in a community setting. Documentation must be provided if visits are not completed in the home setting (safety reasons, participant preference, etc.). Visits should not occur on a regular basis in an office environment (clinic, agency, etc.); and
 5. Community care coordinator/CHW documentation for home visits must be completed within two business days and submitted for review by assigned supervisor; and
 6. Document safety measures for home visits.
- D. Policies and procedures addressing supervision of community health workers and non-professional community care coordinators, including at a minimum:
1. Document frequency of performance reviews; and
 2. Documentation that caseload and referral management reviews occur between the CHW/community care coordinator and supervisor in person or by telephone at least monthly; and
 3. Document community care coordinator/CHW to participant ratios to determine maximum caseload per full- and part-time equivalent community care coordinators/CHWs; and

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4. Document supervisor to community care coordinator/CHW ratio not to exceed 6 full-time community care coordinators/CHWs per supervisor; and
 5. Document how a participant’s comprehensive assessment, plan of care, and Pathways provided by a community care coordinator/CHW are reviewed and signed off by one supervisor; and
 6. Document that supervisor review and sign-off occurs within five (5) business days from date of completed home visit; and
 7. Document timeline and action taken by the community care coordinator/CHW and supervisor when urgent issues are identified.
- E. Policies and procedures that outline how the agency will respond in emergency situations (Natural disasters, pandemics, etc.).
1. Emergency plan addressing the delivery of services to participants during an emergency, that is reviewed and updated annually; and
 2. Training for staff on how to protect themselves during an emergency; and
 3. Training on strategies to provide learning modules and resources for participants (Connecting to telehealth, safety, etc.).

Standard #10 - The Pathways Agency has effective Human Resource policies and procedures.

Rationale/Background

To ensure equitable and consistent application of Pathways Agency policies, procedures, and benefits, the agency’s personnel must be knowledgeable of human resources policies and procedures that govern the Pathways Agency.

Review Items to Achieve Standard #10

- A. The Pathways Agency’s Human Resource Manual, that includes at a minimum documentation of:
1. Training requirements; and
 2. Policies regarding hiring, termination, outstanding performance, dress code, complaint procedures; and
 3. Travel policy to allow individuals to meet job requirements; and
 4. Background check information; and
 5. Sexual harassment and discrimination policies; and
 6. Disciplinary policy; and
 7. Problem-resolution process.

Standard #11 - The Pathways Agency is a culturally sensitive organization that provides culturally and linguistically appropriate services.

Rationale/Background

The Pathways Agency model of care coordination focuses on improving health, advancing health equity, improving quality, and eliminating disparities. Consequently, it is vital to provide effective, equitable, understandable, and respectful quality services that are responsive to diverse cultural health beliefs and practices, preferred languages, health literacy, and other communication needs. PCHI has developed training on the National Culturally and

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Linguistically Appropriate Services (CLAS) Standards that is available to PAs applying for certification.

Review Items to Achieve Standard #11

- A. The Pathways Agency’s organizational policies reflect the adoption of the National Culturally and Linguistically Appropriate Standards; and
- B. Documentation that the Pathways Agency provides training to staff at least every 2 years on how to provide culturally and linguistically appropriate services reflecting the population served:
 - 1. Provide training overview that incorporates an understanding of the different needs and backgrounds of populations served and how care coordination staff are sensitive and responsive to those unique needs; and
 - 2. Training activities should include a focus on diversity and inclusive practices; and
 - 3. Sign-in sheets documenting those in attendance; and
 - 4. Plan for staff that do not attend training.

Standard #12 – Community care coordinators/community health workers have comprehensive training, education, and support.

Rationale/Background

Education, training, and support for community care coordinators/community health workers (CHWs) is essential to achieve improved health outcomes for those at risk. CHWs and other community-based care coordinators must meet the minimum PCHI training requirements ([Appendix C](#)).

Review Items to Achieve Standard #12

- A. Description of training that community care coordinators/community health workers have completed; and
- B. Documentation that each community care coordinator/community health worker has completed all required components of comprehensive training; and
- C. Documentation of expectations for hiring and onboarding of community care coordinators/community healthworkers:
 - 1. CHW or community care coordinator job description; and
 - 2. Background check completed before hire; and
 - 3. Documentation that community care coordinator/CHW foundational training begins within 30 days of hire; and
 - 4. Minimum training requirements before community care coordinators/CHWs interact with participants:
 - a. Standard Pathways and data collection tools
 - b. Mandatory reporting requirements
 - c. Safety during home visits
 - d. HIPAA requirements; and
 - 5. Onboarding checklist for community care coordinators/community health workers.

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Standard #13 – Community care coordinators/community health workers are supported by effective and culturally competent supervisors working within the professional scope of their license.

Rationale/Background

All community care coordinators/community health workers should be supported and supervised by a registered nurse, licensed clinical social worker or another health, social, behavioral, or oral health professional that understands and values the role of community care coordinators/CHWs. Experienced community care coordinators/CHWs may function in a supervisory role when part of a care team. Community care coordinator/CHW supervisors must be culturally competent, attend CHW trainings, and be proficient in supervising community care coordinators/CHWs.

Review Items to Achieve Standard #13

- A. Community care coordinator/CHW supervisor job description; and
- B. Community care coordinator/CHW supervisors' current resumes and/or curriculum vitae; and
- C. Documentation that the community care coordinator/CHW supervisor completed the minimum CHW training requirements (**Appendix C**) through,
 - 1. Attendance at foundational CHW training or
 - 2. Completion of the PCHI Training Template confirming that minimum CHW training requirements have been met.

Standard #14 – The Pathways Agency uses PCHI approved participant curriculum with the Learning Pathway.

Rationale/Background

Each Standard Pathway, when completed, represents a specific individually modifiable risk factor that has been identified and addressed. Many modifiable risks in community-based care coordination can be addressed through learning and behavior change. The PCHI participant curriculum incorporates one or more risk factors within each learning module. The learning modules are tracked with the standard Learning Pathway and can be used for participants of all categories including adult, pregnant or pediatric caregiver. PCHI learning modules are available to all Pathways Agencies applying for certification.

Review Items to Achieve Standard #14

- A. Expectation that PCHI standard curriculum for learning modules is utilized. PCHI learning modules are documented within the Learning Pathway; and
- B. Process that the Pathways Agency uses to approve other evidence-based materials used with the Learning Pathway. Each Learning Pathway should be tied to a specific medical, social, or behavioral health risk factor that can be mitigated and addressed with learning and motivational interventions. Learning materials used outside of the PCHI standard curriculum for learning modules must represent a similar level of effort, time commitment, and expertise in delivery towards a measurable learning outcome.

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Standard #15 - The Pathways Agency ensures care coordination services address the medical, behavioral health, oral health, social, and educational needs of those who are at risk. The Pathways Agency uses approved PCHI data collection tools.

Rationale/Background

The Pathways Agency must collect demographic and other information to effectively and holistically address the medical, behavioral health, oral health, social, and educational risk factors. To improve health outcomes, an individualized care plan must be developed to prioritize and address the participant’s risk factors.

Review Items to Achieve Standard #15

The Pathways Agency uses PCHI-approved data collection tools, including:

- A. PCHI Standard Pathways; and
- B. PCHI Participant Profile, including enrollment and discharge status; and
- C. PCHI Visit Form; including individual and household risks; and
- D. PCHI Progress Form to summarize participant’s individualized Pathways-based care plan; and
- E. Additional data collection items and tools unique to the Pathways Agency can be added as needed.

Standard #16 – The Pathways Agency must use the PCHI Data Model.

Rationale/Background

Implementation of the PCHI Data Model is fundamental to improving the evidence-based effectiveness of the Pathways Agency and its ongoing development and improvements. Benchmarking comparisons and research evaluations involving more than one Pathways Agency requires standardization of data, data entry, and relationships established between data items.

Review Items to Achieve Standard #16

- A. Pathways Agencies using information technology systems are required to use PCHI certified technology vendors.
- B. Pathways Agencies using paper documentation must demonstrate appropriate use of data collection tools and assimilation of the data/reporting.
- C. Pathways Agencies data entry and reporting must be consistent with PCHI Data Model data definitions.

Standard #17 – The Pathways Agency tracks, monitors, and reports on participant services.

Rationale/Background

The Pathways Agency must be able to produce regular quality and performance reports to effectively serve those at risk.

Review Items to Achieve Standard #17

Pathways Agency prepares the PCHI National Benchmark Report on a quarterly basis and

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submits aggregate data to PCHI within 30 days of the completion of the quarter (submission dates: **April 30, July 31, October 31, and January 31**).

Standard #18 – The Pathways Agency develops outcome-based contracts.

Rationale/Background

To help ensure comprehensive and sustainable care coordination services, the Pathways Agency program has diverse and multiple revenue sources.

Review Items to Achieve Standard #18

- A. Summary of annual funding sources to support the Pathways Agency; and
- B. Contracts or other financial documents with the Pathways Agency demonstrating that a minimum of 50 percent of all payments are related to intermediate and final Pathway steps/outcomes using nationally standardized Outcome Based Units (OBUs). (**Appendix D**)