
13. QUALITY MANAGEMENT

A. Quality Studies Medical Records Access

APPLIES TO:

A. This policy applies to all IEHP Medi-Cal Providers, Delegates and Hospitals.

POLICY:

A. For the purposes of medical data processing, quality of care assessment and other research, all Providers, Delegates and Hospitals must provide IEHP access to Members' medical records, at no cost to the Health Plan.^{1,2}

DEFINITION:

A. Delegate – For the purpose of this policy, this is defined as a medical group, Health Plans, IPA, or any contracted organization delegated to maintain and/or provide Member medical record access for use in quality studies.

PROCEDURES:

A. Quality Studies

1. IEHP performs quality studies to meet requirements of the California Department of Health Care Services (DHCS), Centers for Medicare and Medicaid Services (CMS), and the National Committee for Quality Assurance (NCQA). These studies cross over total IEHP Membership.
2. IEHP utilizes NCQA's Healthcare Effectiveness Data Information Set (HEDIS[®]) methodology for all applicable quality studies. For studies not addressed by HEDIS[®], IEHP utilizes a format approved by the agency requesting the study.
3. In order to complete these studies according to required methodologies, IEHP must gather information both from administrative data (i.e., encounter data) and Members' medical records.

B. Delegate Pre-notification

1. IEHP notifies Delegates at least five (5) business days before Providers are contacted for medical record information.
2. Notification includes a description of the study purpose and requirements.

C. Provider and Hospital Notification

1. IEHP notifies Providers and Hospitals if any of their Members have been selected for inclusion in a quality study. Notification includes a description of the study purpose and requirements as well as a list of the Members whose records are needed and the method

¹ California Civil Code (Civ. Code) § 56.10.

² Title 22, California Code of Regulations (CCR) § 51009.

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of data collection.

2. IEHP collects medical record data in one of the following ways, depending on the nature of the study and the location of the Provider's office or Hospital:
 - a. IEHP staff may make appointments with the Provider's office or Hospital to visit the site for the purpose of medical record review and/or data collection. Data collection includes making photocopies and/or scanning hard copy medical records or downloading selected electronic medical records for study purposes.
 - b. IEHP may request that the Provider's office or Hospital retrieve the requested records and mail, fax or email records to IEHP.

D. Confidentiality

1. IEHP maintains compliance with the Health Information Portability and Accountability Act (HIPAA) requirements with all Member medical record information, including information used for the purpose of a quality study.
2. IEHP maintains strict confidentiality when using Member records for quality studies.
3. Members' identities are not disclosed in quality study results.
4. Abstracted data is archived and saved for a period of time determined by the study on an IEHP secure server.

INLAND EMPIRE HEALTH PLAN		
Chief Approval: <i>Signature on file</i>	Original Effective Date:	September 1, 1999
Chief Title: Chief Medical Officer	Revision Date:	January 1, 2021

13. QUALITY MANAGEMENT

B. Quality Management Program Overview for Members and Providers

APPLIES TO:

- A. This policy applies to all IEHP Medi-Cal Members and Providers.

POLICY:

- A. IEHP makes information about the Quality Management (QM) Program, including information on achieving established quality goals, available to all Members and Providers to keep them informed of quality improvement and quality management activities and outcomes.¹

PROCEDURES:

- A. IEHP provides the following information regarding the QM Program to Members and Providers via the IEHP website at www.iehp.org. QM Program information includes:²
1. The “IEHP Annual Evaluation of Quality Improvement Activity Effectiveness Executive Summary” addresses progress in achieving quality goals and contains yearly Healthcare Effectiveness Data and Information Set (HEDIS®) and Consumer Assessment of Healthcare Providers and Systems (CAHPS®) results.
 2. The “Quality Management Program Description” provides information on goals and objectives, QM and Quality Improvement (QI) activities addressing access to care, satisfaction surveys, clinical practice guidelines and IEHP monitoring activities.
- B. Members or Providers who are not able to access the website or prefer a printed version of the QM Program information can request it through the following:
1. Calling the IEHP Member Services Department at (800) 440-IEHP (4347), or (800) 718-4347 for TTY users.
 2. Submitting a written request to IEHP at:

Inland Empire Health Plan
P.O. Box 1800
Rancho Cucamonga, CA 91729-1800
Attention: Quality Management Department

Upon receipt of a written request for information letter, the QM Department staff mails a packet to the requesting party consisting of the QM Program information.

- C. At least annually, IEHP reviews the results of the Quality Withhold measures in the IEHP Quality Improvement Subcommittee (QISC) that has representation from various departments

¹ National Committee for Quality Assurance (NCQA), 2020 Health Plan Standards and Guidelines, MED 8, Element D.

² Ibid.

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B. Quality Management Program Overview for Members and Providers

across the organization. A brief summary of the results are included in the QM Program information.

- D. Members and Providers are advised to contact IEHP in writing if they have suggestions or would like further information on the QM/QI Program and activities.

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C. Chaperone Guidance

APPLIES TO:

- A. This policy applies to all IEHP Medi-Cal Members and Providers.

POLICY:

- A. IEHP and its IPAs ensure Providers adopt a policy that Members are free to request a chaperone and ensure that the policy is communicated to Members.¹
- B. The presence of a chaperone during a clinical examination and treatment must be the clearly expressed choice of a Member; however, the default position should be that all intimate examinations are chaperoned.

PURPOSE:

- A. To ensure respect for the Member's dignity by providing a comfortable and considerate atmosphere for both the Member and the Provider.²

DEFINITION:

- A. Chaperone – A member of the Provider's medical staff whose job is to enhance the patient's and Provider's comfort, safety, privacy, security and dignity during sensitive exams or procedures.

PROCEDURES:

Provider's Responsibilities

- A. Providers should always honor a Member's request to have a chaperone.³
- B. Providers should ensure that all Members are offered a chaperone during any consultation, or intimate examination or procedure.
- C. The Member has the right to decline any chaperone offered. It is important to record in the Member's medical record that the offer was made, and that the Member declined.
- D. Providers should provide the opportunity for private conversations with the Member without the chaperone present. Providers should minimize inquiries or history taking of a sensitive nature during a chaperoned examination.⁴
- E. In instances, where the Member requests or accepts the offer of a chaperoned visit and one is not available at that time:

¹ American Medical Association (AMA), Code of Medical Ethics Opinion 1.2.4, Use of Chaperones, 11/14/16

² Ibid.

³ Ibid.

⁴ Ibid.

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C. Chaperone Guidance

1. The Member must be given the opportunity to reschedule their appointment within a reasonable timeframe.
2. Providers should contact the Member upon notice of unavailability of a chaperone, when necessary.
3. If the seriousness of the condition would dictate that a delay is inappropriate, then this should be explained to the Member and recorded in their medical record.
4. It is acceptable for the Provider (or other appropriate member of the clinical team) to perform an intimate examination without a chaperone if the situation is life-threatening or speed is essential in the care or treatment of the Member. This should be recorded in the Member's medical record.

Chaperone's Responsibilities

- A. Chaperoning should not be undertaken by anyone other than medical staff. This applies to all healthcare professionals working within a clinical or medical office setting.
- B. No family member or friend of a Member may be routinely expected to undertake any formal chaperoning role in normal circumstances.
- C. The chaperone must sign the Member's medical record indicating their presence during the visit.
- D. A chaperone, who identifies unusual or unacceptable behavior by the Provider is expected to report to the IEHP Compliance Hotline (866) 355-9038 or the California Medical Board at (800) 633-2322.

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D. Reporting Requirements Related to Provider Preventable Conditions

APPLIES TO:

A. This policy applies to all IEHP network Providers who treat IEHP Medi-Cal Members.

POLICY:

A. IEHP and its IPAs ensure Provider-Preventable Conditions (PPCs) are reported to the California Department of Health Care Services (DHCS).^{1,2,3}

DEFINITIONS:

A. Provider-Preventable Conditions – These include both Category One (1) – Health Care-Acquired Conditions (HCACs) for any inpatient hospital setting and Category Two (2) – Other Provider Preventable Conditions (OPPC) for any health care setting (See Attachment, “Provider Preventable Conditions” in Section 13).⁴

PROCEDURES:

- A. All Providers must report PPCs through DHCS’ secure online reporting portal, which is found at <https://apps.dhcs.ca.gov/PPC/SecurityCode.aspx>.^{5,6,7}
- B. On a monthly basis, IEHP reviews encounter data submitted by network Providers for evidence of PPCs. IEHP’s HealthCare Informatics team systematically screens and identifies potential PPCs among encounter data and ensure that confirmed PPCs are reported to DHCS Audits & Investigation (A&I) Division through its secure online reporting portal.⁸
- C. On at least an annual basis, IEHP reminds all network Providers of reporting requirements related to PPCs.⁹
- D. All network Providers are responsible for providing IEHP with a copy of all PPCs submitted to DHCS. Copies must be sent by fax at (909) 890-5545 within five (5) business days of reporting to DHCS.

¹ Title 42, Code of Federal Regulations (CFR) § 438.3.

² Department of Health Care Services (DHCS) All Plan Letter (APL) 17-009 Supersedes APL 16-011, “Reporting Requirements Related to Provider Preventable Conditions.

³ DHCS-IEHP Two-Plan Contract, 1/10/20 (Final Rule A27), Exhibit A, Attachment 8, Provision 14, Provider-Preventable Conditions.

⁴ DHCS APL 17-009.

⁵ Ibid.

⁶ 42 CFR § 438.3.

⁷ DHCS-IEHP Two-Plan Contract, 1/10/20 (Final Rule A27), Exhibit A, Attachment 8, Provision 14, Provider-Preventable Conditions.

⁸ DHCS APL 17-009.

⁹ Ibid.

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D. Reporting Requirements Related to Provider Preventable Conditions

E. All completed and submitted PPC submissions are retained by IEHP.¹⁰

F. IEHP reserves the right to recover or recoup any claim related to a PPC.¹¹

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¹⁰ DHCS APL 17-009.

¹¹ DHCS-IEHP Two-Plan Contract, 1/10/20 (Final Rule A27), Exhibit A, Attachment 8, Provision 14, Provider-Preventable Conditions.

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Attachments

<u>DESCRIPTION</u>	<u>POLICY CROSS REFERENCE</u>
Provider Preventable Conditions	13D

Category 1 – Health Care-Acquired Conditions (For Any Inpatient Hospital Settings in Medicaid)

- Any unintended foreign object retained after surgery
- A clinically significant air embolism
- An incident of blood incompatibility
- A Stage III or IV pressure ulcer that developed during the patient’s stay in the hospital
- A significant fall or trauma that resulted in fracture, dislocation, intracranial injury, crushing injury, burn, or electric shock
- A catheter-associated urinary tract infection (UTI)
- Vascular catheter-associated infection
- Any of the following manifestations of poor glycemic control: diabetic ketoacidosis; nonketotic hyperosmolar coma; hypoglycemic coma; secondary diabetes with ketoacidosis; or secondary diabetes with hyperosmolarity
- A surgical site infection following:
 - Coronary artery bypass graft (CABG) - mediastinitis
 - Bariatric surgery; including laparoscopic gastric bypass, gastroenterostomy, laparoscopic gastric restrictive surgery
 - Orthopedic procedures; including spine, neck, shoulder, elbow
 - Cardiac implantable electronic device (CIED) procedures
- Deep vein thrombosis (DVT)/pulmonary embolism (PE) following total knee replacement **with pediatric and obstetric exceptions**
- Latrogenic pneumothorax with venous catheterization
- A vascular catheter-associated infection

Category 2 – Other Provider Preventable Conditions (For Any Health Care Setting)

- Wrong surgical or other invasive procedure performed on a patient
- Surgical or other invasive procedure performed on the wrong body part
- Surgical or other invasive procedure performed on the wrong patient