



## DSRIP Category 3 and Category 1&2 Webinar Reponses to Provider Questions

### Category 3 Questions:

1. We received a request for resubmission asking us to answer questions and give you all a bunch of data. Do you need all of that or can we just give you what you talked about in the corrective action plan?
  - a. *Please send all of the requested data. In most cases, we will need to re-review all of the data for us to verify that the baseline is correct.*
  
2. We have two projects under review. We have received requests for them, but one request just asked for data and another asked for data and a sample. Why are they different?
  - a. *What we need is outcome measure specific and really depends on the results of the first review. Some baselines that were incorrect had only minor errors; therefore, may include requests for sample support. Others baselines that were incorrect had more complex errors; therefore, we may still be asking for data to complete the data file.*
  
3. I have not received a request for anything. What should I expect?
  - a. *If you have not been notified that one of your Category 3 Baselines has been selected for review, you may receive communication advising you that your baseline has been selected for review during an upcoming review of additional Category 3 baselines that is scheduled to start in January 2016.*  
  
*If you have already received notification stating that one of your Category 3 baselines were selected for review, you should receive a request for resubmission of baseline support by the end of November, if you haven't already.*
  
4. I disagree with the corrective action plan I received. Do I still need to submit anything?
  - a. *If you do not understand or you disagree with the corrective action plan, there is a dispute process in place to clarify or resolve any disagreements. The process is initiated by the provider sending an email to MSLC clearly stating the point(s) of*



*disagreement. The email should be directed to your Category 3 Baseline Review point of contact at MSLC. MSLC will review those points and respond via email or set up a conference call to discuss. If a resolution cannot be reached, the matter will be escalated to HHSC.*

5. Why are you asking for a sample?

- a. *For Cat 3 baseline review, and Cat 1 & 2 performance review, MSLC is requesting a sample to validate what has been reported to HHSC. In order for us to determine that a baseline is correct and that a metric has been met, we have to review a sample of detailed patient records that support the reported data.*

6. How do you want us to send the requested data? For instance, do you want it sent via secure email or through the FTP site?

- a. *All supporting documentation should be submitted through the secure FTP site in order to safeguard all PHI. If you have any issues accessing the secure FTP site, please contact Krista Gronniger. You can contact us to request an account and also if you need to add or remove any FTP contacts.*

7. Best person to contact with questions over a request?

- a. *If you have a question over a request or a corrective action plan, please contact the individual that sent you the request. MSLC has specific people assigned to work with you on specific Category 3 outcomes and Category 1 & 2 performance review. Therefore, contacting the individual that sent the request is the best way to assure you get the information needed.*

8. When will we know the results of the review?

- a. *The results of phase 2 (Corrective Action Plans) of the Category 3 baseline reviews will be communicated to providers as individual reviews are completed. This process will continue through January 2016 for those providers that are already working on their Corrective Action Plans. We will continue to work with providers to come to an agreement on a correct baseline.*

9. What are you using as the basis for your review?



- a. *The final compendium on HHSC's website is the primary criteria used. We also utilize measure specific Measure Stewards and other clinical performance measure references as needed.*
  
10. Will Category 3 Performance Review only include the outcomes that were reviewed in the baseline review?
  - a. *No, those reviewed during baseline review will be eligible, but are not automatically going to be selected for performance review. There will be outcomes selected for performance review that were not part of the baseline review. Providers will be notified of the projects included in performance review once those selections have been made.*
  
11. What if I can't provide something that is being asked for?
  - a. *Contact MSLC and discuss the issue with your point of contact (the individual who sent the request to you) as soon as possible. We will work with providers to assess data limitations and make an effort to identify alternative information that can be used to try and make a determination on the accuracy of the baseline.*
  
12. How do we know where we are in the process?
  - a. *Phase 1 was through the end of September and Phase 2 began in October. Not all providers are at the same place in the Phase 2 process depending on the outcome, data, and complexity of the issues noted. Please reach out to your point of contact for your project if you need more clarification as to where your project is in the review process. If you have not been in communication with us to date, your Category 3 baseline has probably not yet been selected for review.*
  
13. How do you validate a Category 3 Baseline that was established by using a proxy?
  - a. *The validation process for baselines established by using a proxy can differ based upon the outcome measure. For details pertaining to your baseline, please reach out to your MSLC point of contact who sent you the request for help determining what will need to be requested from the proxy.*
  
14. Did I hear that any baseline that is incorrect during October Reporting is automatically flagged for MSLC performance review?
  - a. *If a Cat 3 baseline is currently being reviewed by MSLC and the provider chooses to report performance to HHSC in October DY4, a review of that provider's performance*



*for that outcome will be performed if the baseline reported to HHSC during October reporting is different than the baseline reviewed by MSLC.*

15. It would be more helpful if you could send these patient requests in an Excel format instead of Word.

*a. Where possible, MSLC will send requests in an Excel format. However, if you have any concerns or questions with the requests that you receive, please contact the MSLC point of contact who requested the information and they will work with you to help get you what you need and resolve any issues.*

16. One of the corrective action plan items required us to include codes from Table CCS-A to demonstrate the cervical cancer screening. Where can we obtain the Table CCS-A Codes?

*a. Below is a link where the Table CCS-A Codes can be found:*

<http://www.ncqa.org/portals/0/Publications/Cervical.Cancer.Screening.xls>

*b. If there is data being requested from you and you do not understand what it is or where to find the necessary information, please reach out to the individual that sent you the request and they will be able to give you more project and outcome specific information that will be helpful in gathering the data that you need.*

17. Can you revisit common issues arising during the Cat 3 review process? For example, what types of mistakes are providers making?

*a. MSLC will communicate to outcome measure summaries that state the common issues arising during the Category 3 Review process to HHSC. HHSC will then communicate that information to providers.*

18. Do the timeframes for Cat 3 (Phase 1 and Phase 2) also apply for projects that reported baseline in the carryforward window? I.e. if the baseline was first reported in April, should that project expect to be in Phase 2 right now?

*a. Not necessarily. Only a sample of the population of projects that reported a confirmed baseline to HHSC as of April DY4 are currently under review. Providers that are currently under review have already been notified. There will be a review of additional Category 3 baselines starting in January 2016; however, the selection criteria for these projects has not been established. Once projects have been selected for this review, providers will be notified.*

19. What is the allowable margin of error, if any?



- a. MSLC is performing a compliance review and is not factoring in an allowable margin of error.
20. In the request for resubmission of baseline support, we are asked to provide several data elements for all patients included in the supporting documentation - is this referring to the sample size or our entire patient population?
- a. *The request for resubmission of the baseline data is not the same as the sample request. The request for resubmission of baseline support is a request for all of the listed data elements for the entire population of your baseline. The sample request will include a list of patients selected for the sample along with specific instructions on what data elements will be needed for the review.*
21. Do we respond to the corrective action plan prior to receiving preliminary approval?
- a. *If you have questions or disagree with the noted issues in the Corrective Action Plan, please contact your MSLC point of contact that sent you the request as soon as you identify concerns with the Corrective Action Plan. You do not need to wait for further communication from MSLC.*
22. Do we choose the sample file or do we first send the full data file (to confirm numerator and denominator) and then MSLC chooses the sample patients?
- a. *MSLC will select the sample patients and provide the list to the provider along with corresponding documents to submit.*
23. Regarding upcoming Performance Reviews. How many projects per Performing Provider will be reviewed? Will different projects be selected for the different measure types, i.e. CAT 3, QPI, etc.?
- a. *The projects selected for performance review have yet to be determined. If you are selected for performance review, you will receive a notification after the baseline verification process.*

## Category 1 & 2 Questions

1. Will all providers have Cat 1 and 2 metrics reviewed?
  - a. *Not every provider has a DY2/DY3 metric included in Round 1 of Cat 1 and 2 Validation; however, the selection criteria for Rounds 2 and 3 have not been finalized.*
2. What criteria will be used to determine which Cat 1 & 2 projects and metrics will be reviewed?





- 6. We don't perform means testing for low income uninsured and this is an estimate. What will be required for review for MLIU?

*MSLC will review the methodology used to arrive at the MLIU estimation and request support based on that methodology.*

- 7. For Cat 1 & 2 review, if a metric is selected for review during the first round, will the same metrics be selected for round 2, in the same manner as the Cat 3 baseline-performance review where you are automatically selected based on previous selection?

- a. *The selection criteria for Rounds 2 and 3 have not been finalized.*

- 8. What was round 3? I missed it

- a. *Round 3 is Validation of DY5 QPI Metric Achievement. The timeframe is to be determined. Please see the table below for a summary of the phases during Cat 3 Baseline Review and the Rounds during Cat 1 and 2 Validation.*

<b>Name of Review</b>	<b>Type of Review</b>	<b>Review Period</b>
<i>Cat 3 Baseline Review – Phase 1</i>	<i>Assess accuracy of reported Cat 3 baselines</i>	<i>06/2015 – 09/2015</i>
<i>Cat 3 Baseline Review – Phase 2</i>	<i>Implementation of Corrective Action Plan</i>	<i>10/2015 – 01/2016</i>
<i>Cat 1 and 2 Validation – Round 1</i>	<i>DY2/DY3 metrics</i>	<i>10/2015 – 04/2016</i>
<i>Cat 1 and 2 Validation – Round 2</i>	<i>DY4 metrics and DY3 Carryforward Metrics</i>	<i>03/2015 – 06/2016</i>
<i>Cat 1 and 2 Validation – Round 3</i>	<i>DY5 metrics</i>	<i>TBD</i>

- 9. How extensive do you anticipate the Cat 1 & 2 project review to be, are we talking multiple metrics for the selected providers or 1 from each, what type of volume can we anticipate, as we prepare?

- a. *The majority of providers selected for Round 1 of Cat 1 and 2 Validation have only 1 metric that will be reviewed. There are some providers that will have 2 or 3 metrics reviewed. The metrics selected for review were largely based on valuation and type of metric. Providers will be notified of the metrics selected for review by the end of November 2015.*

- 10. Will we be notified before a site visit?

- a. *Yes. If you are selected for a site visit, we will send you notification and ask for agreeable dates for us to come on site. That will also include a suggested list of documentation that we would like to review while there.*



## General Questions

1. Do you send out email only, or do you also send paper mail? I am worried about not recognizing an email as being from you.
  - a. *MSLC has only been sending out notifications via e-mail to date. Email addresses from us will always be in the format jdoe@mslc.com. We include anchor contacts and usually include more than one provider contact on our e-mail communication.*
  
2. The data files for upload are potentially huge (patient charts, etc). Is this anticipated?
  - a. *We understand that many of the files may be large and while the FTP site can handle these large files, we can work with you to obtain the needed data. Please contact the person that sent you the request to discuss any concerns you may have with the size of the data you are submitting.*
  
3. How many projects can we expect to have reviewed? More cat 3's or just cat 1 and 2's?
  - a. *There will be additional Cat 3 and Cat 1 and 2 projects reviewed. The number of projects for future reviews has not been finalized at this time. Providers will be notified as soon as that determination has been completed.*
  
4. Do we ignore HIPAA in sending MSLC supporting documentation?
  - a. *No, please do not ignore HIPAA requirements when sending PHI. Please follow all HIPAA guidelines when handling your PHI and upload all supporting documents containing PHI to the FTP website in order to send them to MSLC for the review process.*

*Regarding PHI, HHSC has provided the following guidance:*

    - "We had a number of questions from providers related to sharing of PHI with MSLC, and want to share HHSC responses with all anchors. Please share this information with providers in your region:*
    - i. *Based on HHSC analysis, Medicaid providers and HHSC are acting as covered entities. The provision of the PHI in this instance is a permitted use both for payment and as part of a health oversight activity (see 45 CFR 164.512(d)).*
    - ii. *Since there is a data use agreement and a business associate agreement between MSLC and HHSC, any transmission of PHI to MSLC for the purposes of fulfilling their compliance monitor function is not an unauthorized release of PHI. In the case of data usage and access, MSLC as the compliance monitor is acting on behalf of HHSC.*
    - iii. *According to Sec. 1.2.3 of the HHSC Medicaid Provider Agreement, a provider is required to "maintain all records necessary to fully disclose...any*

