

RECONSIDERATION PROCESS AND POLICY



Purpose of this document

To provide a policy and process by which medical groups, clinics, and providers may request to have their data reconsidered and recalculated. This option is available during the medical group review period that follows each new round of reports.

Background: Q Corp reporting

The Oregon Health Care Quality Corporation (Q Corp) is dedicated to improving the quality and affordability of health care in Oregon by leading community collaborations and producing unbiased information. The goal of Q Corp's measurement and reporting initiative is to improve patient care by coordinating and consolidating quality and utilization information. Quality Corp creates and distributes quality and resource use reports for medical groups and providers twice per year, in the spring and fall.

- **Spring Reports** – Following the spring reporting round, results for a subset of measures are reported on Q Corp's consumer website, PartnerForQualityCare.org, for clinics that meet Q Corp's public reporting criteria.
- **Fall Reports** – This second round of reports is intended to provide information for internal use by medical groups, providers and participating Q Corp data suppliers. Fall results are not updated on Q Corp's consumer website.

Measuring the quality of health care requires a number of complicated technical decisions. Q Corp's Measurement and Reporting Committee, composed of consumers, providers, employers, policymakers and health insurers, studies measurement issues and helps to guide key decisions in this initiative.

Why would a medical group review its data and apply for reconsideration?

There are several reasons a medical group may elect to review its data and apply for reconsideration. These include:

- **Public reporting** – Following the spring reporting period, results for a subset of measures are posted on Q Corp's consumer website for clinics that meet Q Corp's public reporting criteria.
- **Other reporting** – Medical groups may use Q Corp measures for other reporting initiatives, including OHA Patient-Centered Primary Care Home certification program, CMS Comprehensive Primary Care Initiative gain sharing, health plan contracting, and others. Recently, Q Corp elected to add measures that align with quality and resource use measures used for Cover Oregon and Coordinated Care Organization (CCO) incentives down to the provider level. Please note that these scores are not tied to the incentive payments but do provide the ability to identify patients in need of a recommended service such as breast cancer or cervical cancer screenings.
- **Q Corp data supplier files** – Following each reporting period, Q Corp returns medical group, clinic and provider scores to its participating data suppliers.
- **Quality improvement** – Medical groups that use Q Corp's reports for internal quality improvement efforts may wish to review their data for accuracy.

I. Reconsideration Request Policy

Q Corp's measurement initiative uses the most widely available data source – administrative claims (billing) records – to measure patient care quality. Using only administrative claims records to measure quality can result in inaccuracies. To ensure fairness, the initiative has developed the following policy that includes a provision for reconsideration and recalculation of a clinic's results. This policy is intended to provide a fair and transparent process by:

- Establishing consistent criteria by which data will be reconsidered/recalculated;
- Providing a timely process for review;
- Focusing on improvement of quality measurement;
- Ensuring the privacy and security of patients.

The criteria and process outlined in this document follows the spirit of the *Patient Charter for Physician Performance Measurement*, achieved through national consensus (healthcaredisclosure.org/activities/charter).

Medical groups that wish to have their data formally reconsidered and their results recalculated **must return a completed Reconsideration Request form (last page) and enter all data corrections through Q Corp's online secure portal by the deadline** listed in report materials and posted at <http://q-corp.org/reports/provider-reports>.

The reconsideration process will be administered by Q Corp staff in consultation with Q Corp's Measurement and Reporting Committee and data vendor, Milliman, Inc., as necessary. During public (spring) report rounds, if the initiative is unable to respond to requests in a timely manner it will not publish results for a clinic while reconsideration requests are pending. Instead, results for the clinic will be noted on the website as "Results Under Review."

As part of the review and reconsideration process, Q Corp will provide a clear timeframe for the medical group review period and deadline by which reconsideration requests and online feedback must be received. Medical groups will receive a mailed letter and email (if an email address is on file) prior to the medical group review period, which will include the following information:

- The targeted date when data on the secure portal will be refreshed and open to medical groups;
- A list of the measures that will be publicly reported (spring reporting rounds);
- The dates of the medical group review period and deadline by which to request formal data reconsideration;
- Who to contact for questions or to obtain support in the process for reconsideration.

For medical groups that are interested only in supplying feedback about their data accuracy, but are not requesting that their data be reconsidered for public reporting, please see "Data Review and Feedback Process" available at <http://q-corp.org/reports/provider-reports>. Q Corp will work with all who submit information about data inaccuracies through the secure website, regardless of whether or not a reconsideration request is made. For medical groups that believe their clinic(s) should be excluded from public reporting entirely, please see "Policy for Exclusion from Public Reporting" available at <http://q-corp.org/reports/provider-reports>.

Q Corp will apply consistent criteria to assess which patient-level feedback or corrections received through the secure portal will be accepted. The following are the criteria used to assess requests for reconsideration of a clinic's results:

Correction requests that will typically be accepted:

- This provider left the medical group. *Termination date requested.*
- This provider has never belonged to the medical group or clinic.
- This provider is a specialist (not a primary care provider), and therefore, shouldn't be assigned patients.
- Patient is unknown to clinic or medical group.
- Patient was not seen during the two-year attribution period (measurement year and year prior).
- Patient does not meet the specific criteria for the measure. *Additional information required.*
- Patient meets the specific criteria for the measure and DID have service. *Additional information, e.g., date of service, required.*

Correction requests that typically will not be accepted:

- Patient refused service.
- Prescription was written but not filled by patient.
- Order was given but patient did not get screening or test.
- Provider is not responsible for managing the services being measured.
- Disagreement with a measurement specification, or with the data collection process/method.
- Measurement results do not match rates or results from a medical group or clinic's internal registry (where numerators and denominators are not comparable).

IMPORTANT: To protect patient privacy, all communication about individual patients and their care must be submitted through Q Corp's secure online portal, accessible from the provider landing page at <http://q-corp.org/reports/provider-reports>. **Please do not deliver patient information directly to Q Corp staff.**

Q Corp will review all formal reconsideration requests and respond to the discrepancies submitted through the secure online portal. Corrections do not require extensive documentation by the medical group or clinic beyond a date of service and comments. However, the initiative reserves the right to request additional documentation to verify corrections. Q Corp's response to a reconsideration request will be made within 30 days of receipt and will include:

- Decisions regarding corrections and reasons why corrections were accepted or not;
- Whether the publicly reported category will be changed;
- Request for additional information if necessary, or request to conduct an audit to verify data in the medical record.

II. Reconsideration Request Process

Medical group review period

Q Corp's reports are distributed as mailed hard-copy reports as well as online reports accessible through a secure provider portal, allowing users to view data at the medical group, clinic, provider, and patient levels. The physicians, nurses, and medical group administrators who helped design Q Corp's measurement and reporting initiative emphasized that providing patient-level detail to medical groups is essential if claims information is to be validated, trusted, and useful.

Based on feedback from multiple medical groups that plan to use Q Corp data for other reporting initiatives – including OHA Patient-Centered Primary Care Home certification program, CMS Comprehensive Primary Care Initiative gain sharing, health plan contracting, etc. – Q Corp offers an optional medical group review period following each round of reporting (spring and fall), with the opportunity for medical groups to have their scores reconsidered and recalculated.

The medical group review period begins when refreshed data become available to medical groups on Q Corp's secure online portal. As all groups with access to the portal have an email on file, Q Corp will send an email message announcing when refreshed data are available. **Note that mailed hard-copy reports may reach medical groups after the start of the medical group review period.**

Submission and review of reconsideration request

If a medical group has checked patient-level information for accuracy and believes that correcting the information will cause a change in its clinic-level results for one or more publicly reported measures, it must communicate any request to modify the results to Q Corp staff by the deadline posted on:

- Q Corp's provider landing page, <http://q-corp.org/reports/provider-reports>
- Q Corp's secure portal login page, accessible via button on provider landing page (above)
- Mailed letter to medical group contact announcing upcoming data rollout
- Cover letter of hard-copy medical group/provider reports

The following steps describe the reconsideration process:

- A. A medical group must submit a completed Reconsideration Request form to Q Corp in which it indicates discrepancies identified in the data that it believes will cause a change in its clinic-level results. The request form must be signed by an appropriate authority for the medical group.
 1. Medical groups must submit patient-level data corrections through the secure online portal before review of the reconsideration request will begin. Patient information shall not be sent directly to Q Corp staff.
- B. Q Corp staff will review all requests for completeness and confirm receipt within five (5) working days. Staff will notify the medical group contact if any additional information is needed to complete the request.
- C. Q Corp's measurement staff will review feedback submitted through the secure online portal. Staff may call on Q Corp's data vendor, Milliman, Inc., to provide supporting information derived from the claims database.

- D. Q Corp's Senior Director of Informatics will review all requests and make decisions based on the information supplied on the Reconsideration Request form, corrections submitted through the secure portal, and supporting information from the data vendor.
 - 1. If Q Corp's reconsideration criteria do not indicate a clear decision on a particular request, the Senior Director of Informatics will consult with Q Corp's Medical Director to reach a decision.
- E. Q Corp's Executive Director will remain informed of all requests for reconsideration.
- F. Q Corp will schedule a call with the medical group contact to respond to the patient-level corrections submitted through the secure portal and offer a basis for decisions made.
- G. Formal notification of decisions and results of data recalculations will be communicated to the medical group in a written letter from Q Corp's Senior Director of Informatics within 30 days of the deadline for submitting reconsideration requests.
 - 1. In rare cases where detailed verification of claims records and patient information requires longer than 30 days, Q Corp will notify the medical group with an explanation. If a request is not resolved before public data are posted, quality results for the clinic(s) will be noted on the website as "Results Under Review."
- H. If the decision reported by the Senior Director of Informatics is not in the medical group's favor, the medical group may submit a written appeal to Q Corp's Executive Director and Medical Director.
 - 1. The Executive Director will determine if additional information is needed. During this process, any appellant who wishes to make a presentation to the Executive Director will be granted the opportunity to do so.
 - 2. The Executive Directors will make decisions about the dispensation of the appeal and their decision will be communicated to the medical group contact in a written letter from the Executive Director within 45 days of the appeal.
 - a. Should additional expertise or review be needed, the appeal will be advanced to Q Corp's Measurement and Reporting Committee, a subcommittee of the Q Corp Board of Directors, for determination.
 - 3. During the appeals process, quality results will be noted on the website as "Results Under Review."

RECONSIDERATION REQUEST FORM



CONTACT INFORMATION

Contact Name: _____

Medical Group Name: _____ Title: _____

Address: _____

Phone: _____ Email: _____

RECONSIDERATION INFORMATION

Name of clinic(s) for which reconsideration is requested: _____

Feedback has been submitted through the secure portal: ☐ Yes ☐ No

If No, please give date this will be completed: _____

☐ **Additional Information:** Please describe any special circumstances surrounding your clinic or medical group that you feel are important for reviewing this request:

By signing this form, the applicant agrees that all of the above information is a correct reflection of the medical group's, clinic's or provider's characteristics, and that the applicant is authorized to make this request on behalf of the medical group or clinic.

Applicant Signature, Title

Date

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