



JENNIFER KENT
DIRECTOR

State of California—Health and Human Services Agency
Department of Health Care Services



EDMUND G. BROWN JR.
GOVERNOR

DATE: SEPTEMBER 15, 2017

PRIME POLICY LETTER 17-009

TO: PRIME ENTITIES

SUBJECT: METRIC 2.2.2 – HCAHPS UPDATED REPORTING INSTRUCTIONS AND DATA CORRECTIONS

PURPOSE:

This PRIME Policy Letter (PPL) notifies PRIME entities of two reporting policy changes for Metric 2.2.2 – HCAHPS: Care Transition Metrics. These changes affect Demonstration Year (DY) 12 Year-End reporting narratives for all PRIME entities and previously reported mode-adjusted data for some PRIME entities for DY 11 Year-End and DY 12 Mid-Year. The instructions contained within this letter supersede the PRIME Data Modification Policy issued on July 17, 2017.

BACKGROUND:

The DY 11, DY 12 Mid-Year and DY 12 Year-End Reporting Manuals' General Guidance sections instructed PRIME entities to report their HCAHPS mode adjusted composite rates as a whole number value over a denominator of 100. These instructions aligned with the accuracy of the two-decimal place benchmarks. The General Guidance sections did not contain unique instructions for entities, not requiring mode-adjustment, using only raw data.

The DY 12 Mid-Year reports demonstrate that the previously issued reporting instructions for Metric 2.2.2 mode-adjusted data are inconsistent with the gap closure methodology for PRIME Pay-for-Performance (P4P) metrics. This inaccuracy jeopardizes entities' ability to earn PRIME achievement funds in accordance with the PRIME gap closure methodology outlined in the Special Terms and Conditions, Attachment II. If left unaddressed, entities who reported a whole number over 100 would only earn full P4P funding for Metric 2.2.2 based on greater than a 10% gap closure between the 25th and 90th percentile.

POLICY:

Effective DY 12 Year-End and beyond, all PRIME entities must describe in their Metric 2.2.2 methodology narrative whether they either used mode-adjusted reporting or clarify that mode-adjustment is not applicable for their reporting methodology.

Effective DY 11 and subsequent DYs, all PRIME entities must report at least four significant digits for Metric 2.2.2– HCAHPS. Entities, for whom mode-adjustment is applicable, must report their HCAHPS mode-adjusted rate as a whole number over 10,000. This updated reporting policy applies four decimal places to the accuracy of the PRIME gap closure methodology, and allows entities to report a mode-adjusted rate comparable to the metric's benchmark values. Entities for whom mode-adjustment is not applicable, simply report their raw numerator denominator. The portal will auto-calculate the achievement rate to four significant digits.

For example, a PRIME entity reported a mode-adjusted rate of 46/100 in DY 11 and 46/100 DY 12 Mid-Year. The improvement could not be demonstrated given that only two significant digits were used for the numerator. The entity will need to correct its previously denominator to be 10,000 instead of 100 and the numerator to be a whole number that reflects a mode-adjusted rate accordingly (e.g. 4601/10,000) as applicable to the measurement period.

In another example, a PRIME entity reported 52/100 in DY 11 and 52/100 DY 12 Mid-Year. The PRIME entity did not apply a mode-adjustment since mode-adjustment was not applicable. The improvement could not be demonstrated given that only two significant digits were used for the numerator. The entity will need to correct its previously reported numerator and denominator to be the raw numerator/denominator (e.g. $181/350 = 0.5171$) as applicable to the measurement period.

To ensure correct P4P payment for Metric 2.2.2 – HCAHPS: Care Transitions at DY 12 Year-End, entities should ensure that their DY 11 and DY 12 Mid-Year reporting for Metric 2.2.2 complies with the requirements above. Please contact your PRIME liaison to unlock this metric for DY 11 and DY 12 Mid-Year if your reports need to be corrected. If applicable, entities must correct their Metric 2.2.2 data prior to September 30, 2017.

District/Municipal Public Hospitals (DMPH) not in P4P status for Metric 2.2.2 do not need to contact their PRIME liaisons to have this metric unlocked and corrected. DMPHs should follow the updated narrative reporting instruction effective with DY 12 Year-End reporting.

If you have any questions regarding this PPL, please contact your PRIME Liaison or email the PRIME Mailbox at PRIME@dhcs.ca.gov.

Sincerely,



Neal D. Kohatsu, MD, MPH
Medical Director
California Department of Health Care Services