



Public Hospital Redesign and Incentives in Medi-Cal (PRIME) Data Integrity Policy

Purpose

The California Department of Health Care Services (DHCS) understands the importance of collecting, maintaining, and sharing data as one of the vehicles for maximizing health care value through the Public Hospital Redesign and Incentives in Medi-Cal (PRIME) program. As such, this PRIME Data Integrity Policy specifies the requirements PRIME entities must follow through the duration of the PRIME program.

For the purposes of this document, data integrity is defined as the quality, consistency, reliability, accuracy, and completeness of data collected and reported under the PRIME program.

PRIME Entity Responsibilities

Each PRIME Entity should:

- 1) Review this Policy;
- 2) Ensure that their data handling practices comply with the requirements outlined in this document; and
- 3) Have a senior official attest to the certification on Page 2 of this document.

Scope

The PRIME Data Integrity Policy applies to all entities participating in the PRIME program during Demonstration Years (DYs) 11-15, including participating Designated Public Hospitals (DPHs) and District/Municipal Public Hospitals (DMPHs). This Policy constitutes a minimum viable standard for maintaining data quality and integrity under the PRIME program. This document is not intended to interfere with any legal, privacy, regulatory, and/or security-related procedures that permit entities to conduct their regular business.

Data Integrity Requirements

A senior official, on behalf of the participating PRIME entity, shall attest to compliance with the PRIME Data Integrity Policy, which consists of the following requirements:

- The PRIME entity's leadership, management and staff, at all levels, must make a good faith effort to manage the risks that might undermine data integrity of the PRIME Program;
- PRIME entity must facilitate data integrity through a process of self-governance, meaning that PRIME entities have the lead responsibility for preventing, deterring, identifying, and rectifying any data integrity issues within their respective programs;
- PRIME entities must ensure that PRIME data meet the following standards:
 - Attributable--establishing who performed an action and when;
 - Legible--recorded permanently in a durable medium, readable by others, with traceable changes;
 - Contemporaneous--with activities recorded at the time they occur (when an activity is performed or information is obtained); and
 - Accurate--reflecting the true information;



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- PRIME entities must retain applicable supporting documentation for a period of five years after submission of Demonstration Year reports, and make such documentation available in case of an audit conducted by external parties. This retention of applicable supporting documentation includes maintenance of all patient-level data used to create submitted PRIME Reports;
- PRIME entities must document and retain records of all incentive payment amounts earned under PRIME, as well as clinical and quality improvement data for PRIME reports for a period of five years after submission of Demonstration Year reports;
- PRIME entities must report to DHCS within 10 business days of discovery, any breach of these requirements that may result in discrepancies with submitted PRIME quantitative or qualitative reports;
 - PRIME entities will report the breach by emailing their PRIME liaison with a summary of the discovery. Further communication between DHCS and the reporting PRIME entity will be determined on a case-by-case basis.
- If a PRIME entity determines within 10 business days that the breach would not result in a discrepancy with submitted PRIME quantitative or qualitative reports, then the breach does not need to be reported to DHCS.

Certification

Senior official shall sign on behalf of the PRIME entity, attesting adherence to the PRIME Data Integrity Policy. Submit an electronic copy of the certification to DHCS by e-mailing PRIME@dhcs.ca.gov on or prior to July 14, 2017. Please retain the original signature page.

Checking this box indicates that the data submitted under PRIME prior to this attestation was both valid and accurate. Checking this box also indicates that from this date forward, the PRIME entity identified below shall adhere to the PRIME Data Integrity Policy for the duration of the PRIME program.

Signature and Date:

Signatory's Name	
Health Care System/ Hospital Name	
Health Care System Designation (DPH or DMPH)	
Title	
Telephone number	
Email Address	
Mailing Address	