



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



GAVIN NEWSOM
GOVERNOR

DATE: February 25, 2019

PRIME POLICY LETTER 19—003

TO: ALL PRIME ENTITIES PARTICIPATING IN PROJECT 3.2

SUBJECT: METRIC 3.2.4 DY 14 TRENDING BREAK

PURPOSE:

This PRIME Policy Letter (PPL) clarifies Demonstration Year (DY) 14 Mid-Year (MY) reporting instructions for metric 3.2.4 - Use of Imaging Studies for Low Back Pain (anytime), due to a trending break.

NOTE: PPL 19-002 no longer applies to metric 3.2.4 for DY 14. Metric 3.2.4 must be reported in accordance with PPL 19-003 for DY 14 MY.

BACKGROUND:

The Department of Health Care Services (DHCS) released PPLs 17-007 and 19-002, which provided instructions for reporting trending breaks. PPL 19-002 specified the metrics with trending breaks in DY 14. Upon further review, DHCS is updating the instructions for metric 3.2.4 for DY 14 MY reporting.

POLICY:

PRIME entities must report two versions of the numerator and denominator data as follows:

1. Entities must apply the DY 14 metric specifications to the DY 13 YE measurement period data, and report the resulting numerator and denominator in the DY 14 MY reporting period's metric-level data capture methodology narrative within the PRIME Reporting Platform. This data will be used to inform DY 14 benchmarks and target rates for metric 3.2.4. Please note that the benchmarking process may delay DY 14 MY payments.
2. Entities must apply the DY 14 metric specifications to the DY 14 MY measurement period data and report the resulting numerator and denominator in

the Reporting Platform's designated numerator and denominator fields. This data will determine an achievement value (AV) that will be used to calculate payment for the applicable reporting period. Please note that the Reporting Platform may not automate the AV correctly when data is entered; however, DHCS will override the automated AV, if necessary, prior to issuance of payment.

If an entity's submitted PRIME report does not follow this policy for metric 3.2.4, it will be deemed incomplete and returned to the entity for completion.

Please contact your PRIME Liaison or email the PRIME Mailbox at PRIME@dhcs.ca.gov for any questions regarding this PPL.

Sincerely,

ORIGINAL SIGNED BY KAREN MARK

Karen E. Mark, MD, PhD
Medical Director