

Encounter Data Improvement Program

2020 Encounter Data Summit

Governance Recommendations

August 7, 2020

Governance Entity

Recommendations

Problem Statement

California has not been successful in prioritizing, organizing, and communicating encounter reporting improvement initiatives, overseeing changes to standards, policies or processes, and supporting communication and collaboration up and down the reporting chain and across lines of business.

Workgroup Recommendations

The workgroup recommends that a governance entity should be identified or created that would be responsible for prioritizing, overseeing, coordinating, and monitoring encounter data improvement efforts in California and seek longer-term sustainable funding. The governance entity's core activities would include:

- Overseeing encounter data training, technical assistance and data standardization activities to ensure industry alignment, promote mutually reinforcing actions, and maximize impact
- Stakeholder communications, engagement and dissemination activities
- Managing budget processes, business planning and sustainable funding efforts necessary to support encounter data improvement initiatives
- Data management, including measuring and monitoring encounter data improvement progress and impact
- Regulatory and industry alignment, including supporting regulatory and business analysis and compliance, proposing incentive frameworks, and advocating for encounter data improvement efforts
- Core operations, including project management oversight, and workgroup and board management

Attribute	Definition
Decision Making	Governance will oversee encounter data improvement programs, identify and target organizations most in need of assistance, monitor program results, establish committees that incorporate stakeholder guidance into program activities, and establish policies and consensus-based decision-making processes.
Authority and Alignment	Governance will establish policies and practices that ensure compliance and alignment with state and federal regulatory guidance, help to align contracting requirements across the business community, and define incentive program frameworks to support encounter data improvement.
Transparency	Governance will make program decision-making and policy development visible to the public, and will ensure encounter data improvement activities and activity-performance is monitored.
Accountable and Responsive	Governance will make a conscious effort to use benchmarks, targets, and performance reporting to improve future performance, instituting processes and feedback mechanisms to respond to its stakeholders changing needs and expectations.
Communication	Governance will monitor changes to the encounter data regulatory landscape and communicate changes – along with relevant, actionable documentation - to implicated stakeholders.
Effectiveness	Governance will establish key performance indicators to measure its impact on practice, enabling and leading change by advancing stakeholder policies, processes, and programs with available resources.
Sustainability	Governance will develop annual budgets and financial controls, and seek funding to sustain its short- and long-term program goals. Governance structures and processes will be self-sustaining to the extent that they remain useful to advancing encounter data improvement.
Participatory/ Representative	Governance will ensure public and private stakeholders have a voice and are adequately and meaningfully represented in program discussions and decision-making.

Recommended Governance Model

The workgroup recommended that HealthNet undertake an open solicitation and selection process to identify a non-profit that would be responsible for overseeing encounter data governance improvement initiatives and processes.

- **The non-profit model met more of the criteria developed by the workgroup than other models.** However, a non-profit’s authority – specifically its ability to compel participants to follow its recommendations and policies – is weaker relative to a public entity, and will require strong participation and engagement from senior stakeholder leaders, including from State government agency participants, in order to be successful.
- The workgroup noted that while an existing non-profit would be best suited to oversee governance, should an RFP process result in a new non-profit emerging as a best candidate, HealthNet should consider and select it if it meets more of their criteria than any other candidate organization.
- Any selected non-profit must have very **intentional and directive transparency goals and policies to be credible**, given they are not beholden to the public record act and State Sunshine laws.

Attribute / Governance Model	Collaborative	Non-Profit	Gov't Advisory	State Agency
Decision-Making	●	●	●	●
Authority and Alignment	●	●	●	●
Transparency	●	●	●	●
Accountable	●	●	●	●
Responsive	●	●	● ●	●
Communication	●	●	●	●
Effectiveness	●	●	● ●	●
Sustainability	●	●	●	●
Participatory/ Representative	●	●	●	●

● Limited Barrier
 ● Moderate Barrier
 ● Significant Barrier

Recommended Role & Responsibilities

Governance will be responsible for prioritizing and overseeing encounter data improvement initiatives and communication efforts, and should seek resources to coordinate programs that maximize impact.

Governing Body

Data Standardization Committee

Tech & TA Committee

Core Activities

Communication

- Stakeholder engagement
- Knowledge management, website, information sharing, publishing and public comment process

Finance

- Manage annual budget process and business planning
- Collect revenues
- Develop proposals and fund initiatives

Core Operations

- Business planning
- Project management oversight
- Work group and board management

Data Management

- Encounter submission performance data collection, analysis and KPI reporting
- Committee data requests

Regulatory and Industry Alignment

- Regulatory and business analysis and compliance
- Incentive frameworks
- Advocacy for advancing efforts

The workgroup recommended that the Governance Entity Board represents the breadth of impacted stakeholder groups

Composition

The workgroup recommended ideal Board representation from the following stakeholder groups:

- Health plans (Medi-Cal COHS, local initiative plans and commercial plans)
- Hospitals (public and private)
- IPAs and MSOs (at least one of whom has a significant Medi-Cal line of business)
- Community clinics (FQHCs)
- Private practice physician
- Behavioral health provider
- Public agency officials (Ex Officio) from:
 - DHCS (Director, or Chief overseeing the Post Adjudicated Claims & Encounters System [PACES]);
 - DMHC (Director);
 - Covered California (CMO); and
 - [Also potentially including CalPERS, OSHPD, CMS and CHHS].

The workgroup noted that the Board should have a Medi-Cal orientation, but should not limit representation exclusively to Medi-Cal stakeholders. It may include stakeholder associations.

Estimated Funding Requirements

Funding requirements for year one implementation would likely range from **\$1,200,000 - \$1,700,000** (recurring annually), including:

- Staff Support: \$750,000 - \$1,100,000
- Professional Services: \$250,000 - \$350,000
- Overhead and Other Expenses: \$200,000 - \$250,000

These do **NOT** include funds needed to launch and support specific initiatives (e.g., encounter data training).

Appendix

Additional Recommendation Material

The workgroup recommended the creation of a Governance Entity Board that includes senior industry leadership and a commitment to diversity.

Qualifications

The workgroup recommended Board representation from individuals in/with:

- Senior leadership positions, experience and authority to effectuate change
- Competencies including strong:
 - Health care industry background
 - Knowledge of encounter data reporting
 - Ability to represent interests of constituency

The workgroup also recognized the importance for a commitment to diversity in Board representation, which may include, but not be limited to diversity among racial, gender, ethnic, cultural, LGBTQ, geographic (e.g., rural, urban, etc.) and other underrepresented groups.

Assessed Resource Requirements

Activity	Functions	Resource Requirement(s)
Core Operations & Governance	<ul style="list-style-type: none"> • Board and committee management and support • Develop initiative proposals 	<ul style="list-style-type: none"> • Staff, including a(n): Executive Director; Project/Program manager; administrative assistant; subject matter experts
Finance	<ul style="list-style-type: none"> • Annual budget and financial controls • Three-year development and sustainability plan • Fundraising and grants management • Business planning 	<ul style="list-style-type: none"> • Finance director/grants manager • Accounting and grants management system • Annual audit
Communication	<ul style="list-style-type: none"> • Establish and manage website • Stakeholder outreach and engagement • Communication plan including: targeted messaging, performance reporting, regulatory and business updates, program status and updates, public comment forum 	<ul style="list-style-type: none"> • Website • Communication director
Data Management	<ul style="list-style-type: none"> • Establish improvement targets and KPIs • Collect metrics and performance reports • Performance evaluation and reporting 	<ul style="list-style-type: none"> • Data analyst • Dashboard reporting system (e.g., Tableau)
Regulatory and Industry Alignment	<ul style="list-style-type: none"> • Policy/regulatory review w/ guidance & policy proposal development • Contracting alignment guidance • Incentive program framework development 	<ul style="list-style-type: none"> • Policy/business analyst