

# **AHCCCS Final Differential Adjusted Payment (DAP) Rule CYE 2020: HIE Participation Requirements, Milestones, Roles & Responsibilities**

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# Agenda

1. Purpose
2. DAP Basics
3. Letter of Intent (LOI) Submission Process
4. DAP HIE Requirements
5. Health Current vs. Participants: Roles & Responsibilities
6. Q&A

# Purpose

The purpose of this webinar is to clarify the Health Information Exchange (HIE) requirements for eligible providers participating in the AHCCCS Differential Adjusted Payments (DAP) program.

The intended audiences for this webinar:

- Hospitals Subject to APR-DRG Reimbursement
- Other Hospitals and Inpatient Facilities
- Critical Access Hospitals
- Integrated Clinics

# DAP Basics



## Differential Adjusted Payment (DAP) Basics



- Preliminary Notice posted to AHCCCS website in late January
- Comments accepted through March 4, 2019
- Final Public Notice published April 30, 2019

The DAP CYE2020 Final Public Notice is available here:

[https://www.azahcccs.gov/AHCCCS/Downloads/PublicNotices/rates/AHCCCS\\_DAP\\_CYE2020\\_Final\\_Public\\_Notice\\_April\\_30\\_2019.pdf](https://www.azahcccs.gov/AHCCCS/Downloads/PublicNotices/rates/AHCCCS_DAP_CYE2020_Final_Public_Notice_April_30_2019.pdf)

Information about HIE requirements for DAP CYE2020 is available here:

<https://healthcurrent.org/ahcccs-programs/differential-adjusted-payment-program/>

# Differential Adjusted Payment (DAP) Final Public Notice

- HIE Requirements in CYE2020 for following entities
  - Hospitals Subject to APR-PRG Payment (Type 02) – **2.5% incentive**
  - Critical access hospitals – **8% incentive**
  - Other Hospital & Inpatient Facilities (psych/71, subacute facilities/B5, rehab hospitals/C4, long term acute care hospitals/C4) – **2% incentive**
  - Integrated Clinics (with BH utilization at least 40%) – **10% incentive**
- Proposed HIE Requirements in CYE2021 for following entities
  - Behavioral Health Outpatient Clinics (HIE data access only)
  - IHS and 638 Tribally Owned and/or Operated Facilities (data submission requirements)
- Future HIE Requirements
  - All AHCCCS providers



# Differential Adjusted Payment (DAP) Final Public Notice



- **CYE2020 HIE Requirements**

- For hospitals, CAHs and other inpatient facilities that participated last year, send immunizations (if applicable) & start data quality efforts
- For hospitals and other inpatient facilities that didn't participate last year, send data according to CYE2019 milestones
- For integrated clinics, send data by May 15, 2019 (same req as CYE2019, but interface must be in production)

- **CYE2021 PROPOSED HIE Requirements**

- Progressive requirements for any category with HIE requirements this year
- For IHS/638, send data according to CYE2019 hospital milestones
- For BH Outpatient Clinics, access HIE data (portal, alerts, etc.) by May 15, 2020
- HIE for new entities available on first come, first serve basis, so get started soon!



# Future DAP HIE Requirement Progression



## Attachment C – HIE Strategy by Provider Type

HIE DAP Criteria	CYE 17	CYE 18	CYE 19	CYE 20	CYE 21	CYE 22	CYE 23	CYE 24	CYE 25
Hospitals	Agreement	Agreement	Milestones	Data Prep	Data Quality	Data Quality	Data Quality	Data Quality	Data Quality
IHS/638 Facilities					Milestones	Data Prep	Data Quality	Data Quality	Data Quality
Integrated Clinics (Ics)			Milestones	Milestones	Data Prep	Data Quality	Data Quality	Data Quality	Data Quality
BH OP Clinics & Ics					Data Access	Milestones	Data Prep	Data Quality	Data Quality
Nursing Facilities						Milestones	Data Prep	Data Quality	Data Quality
HCBS Providers							Data Access	Milestones	Data Prep
Physicians, PAs, etc.							Data Access	Milestones	Data Prep

Agreement	Execute agreement and electronically submit information.
Milestones	LOI with milestones for: execute agreement, approve SOW, transmit ADT, and transmit lab/radiology data. For non-inpatient facilities, transmit registration events and encounter summaries.
Data Access	Execute agreement and access HIE data via HIE services.
Data Prep	LOI with milestones for: submit immunization data (if applicable), execute data quality SOW, and submit data quality profile.
Data Quality	Measure data quality in first quarter of calendar year using a metric to be defined.



# LOI Submission Process



## LOI Submission Process

For most DAP eligible providers (all except integrated clinics), submission of an LOI is required. In LOI, providers agree to achieve HIE milestones by specified dates or maintain participation in the milestone(s) that have previously been achieved.

The LOI submission process entails sending the LOI letter to two email addresses:

Email #1: [FFSRates@azahcccs.gov](mailto:FFSRates@azahcccs.gov)

Email #2: [ceo@healthcurrent.org](mailto:ceo@healthcurrent.org)

The LOI must be sent by **May 15, 2019**

LOI templates are located at:

<https://healthcurrent.org/programs/ahcccs-programs/differential-adjusted-payment-dap-program/>

# DAP HIE Requirements



# Hospitals Subject to APR-DRG Reimbursement

## Hospitals That Did Not Participate in CYE 2019 DAP

### **Milestone #1:**

No later than July 31, 2019, the hospital must execute an agreement with a qualifying HIE organization.

### **Milestone #2:**

No later than October 31, 2019, the hospital must approve and authorize a formal SOW with a qualifying HIE organization to develop and implement the data exchange necessary to meet the requirements of Milestones #3 and #4.

# Hospitals Subject to APR-DRG Reimbursement

## Hospitals That Did Not Participate in CYE 2019 DAP (continued)

### **Milestone #3:**

No later than March 31, 2020, the hospital must electronically submit actual patient identifiable admission, discharge, and transfer information (generally known as ADT information), including data from the hospital emergency department if the provider has an emergency department, to the production environment of a qualifying HIE organization.

## Hospitals Subject to APR-DRG Reimbursement

### Hospitals That Did Not Participate in CYE 2019 DAP (continued)

#### **Milestone #4:**

No later than June 30, 2020, the hospital must electronically submit actual patient identifiable laboratory and radiology information (if the provider has these services), transcription, medication information, and discharge summaries that include, at a minimum, discharge orders, discharge instructions, active medications, new prescriptions, active problem lists (diagnosis), treatments/procedures conducted during the stay, active allergies, and discharge destination to the production environment of a qualifying HIE organization.

#### **NOTE:**

For milestones #3 and #4, the information transferred to Health Current must be actual patient data; the transfer of test data does not fulfill these requirements. It must include all patient data, including behavioral health data and data covered by 42 CFR Part 2.



# Hospitals Subject to APR-DRG Reimbursement

## Returning CYE 2019 Providers

### **Base requirement:**

The hospital must already have in place an active participation agreement with Health Current and must maintain the data submission requirements of the CYE 2019 DAP requirements throughout CYE 2020.

### **Milestone #1:**

No later than July 1, 2019 the hospital must submit actual patient identifiable immunization data to the production environment of Health Current.

### **Milestone #2:**

No later than October 1, 2019 the hospital must approve and authorize a formal Scope of Work (SOW) with Health Current to initiate and complete a data quality profile to be produced by Health Current.

## **Hospitals Subject to APR-DRG Reimbursement**

### **Returning CYE 2019 Providers (continued)**

#### **Milestone #3:**

No later than December 31, 2019 the hospital must complete the initial data quality profile with Health Current.

#### **Milestone #4:**

No later than March 31, 2020 the hospital must complete the data quality scope of work by producing the final data quality profile with Health Current.

#### **NOTE:**

For milestones #1, the information transferred to Health Current must be actual patient data; the transfer of test data does not fulfill these requirements. It must include all patient data, including behavioral health data and data covered by 42 CFR Part 2.

## Critical Access Hospitals

### **Base requirement:**

The hospital must already have in place an active participation agreement with Health Current and must maintain the data submission requirements of the CYE 2019 DAP requirements throughout CYE 2020.

### **Milestone #1:**

No later than July 1, 2019 the hospital must submit actual patient identifiable immunization data to the production environment of Health Current.

### **Milestone #2:**

No later than October 1, 2019 the hospital must approve and authorize a formal Scope of Work (SOW) with Health Current to initiate and complete a data quality profile to be produced by Health Current.

## **Critical Access Hospitals (continued)**

### **Milestone #3:**

No later than December 31, 2019 the hospital must complete the initial data quality profile with Health Current.

### **Milestone #4:**

No later than March 31, 2020 the hospital must complete the data quality scope of work by producing the final data quality profile with Health Current.

### **NOTE:**

For milestones #1, the information transferred to Health Current must be actual patient data; the transfer of test data does not fulfill these requirements. It must include all patient data, including behavioral health data and data covered by 42 CFR Part 2.

## **Other Hospitals and Inpatient Facilities**

### **Providers That Did Not Participate in CYE 2019 DAP**

#### **Milestone #1:**

No later than July 31, 2019, the hospital must execute an agreement with a qualifying HIE organization.

#### **Milestone #2:**

No later than October 31, 2019, the hospital must approve and authorize a formal SOW with a qualifying HIE organization to develop and implement the data exchange necessary to meet the requirements of Milestones #3 and #4.

## Other Hospitals and Inpatient Facilities

### Providers That Did Not Participate in CYE 2019 DAP (continued)

#### **Milestone #3:**

No later than March 31, 2020, the hospital must electronically submit actual patient identifiable admission, discharge, and transfer information (generally known as ADT information), including data from the hospital emergency department if the provider has an emergency department, to the production environment of a qualifying HIE organization.



## **Other Hospitals and Inpatient Facilities**

### **Providers That Did Not Participate in CYE 2019 DAP (continued)**

#### **Milestone #4:**

No later than June 30, 2020, the hospital must electronically submit actual patient identifiable laboratory and radiology information (if the provider has these services), transcription, medication information, and discharge summaries that include, at a minimum, discharge orders, discharge instructions, active medications, new prescriptions, active problem lists (diagnosis), treatments/procedures conducted during the stay, active allergies, and discharge destination to the production environment of a qualifying HIE organization.

#### **NOTE:**

For milestones #3 and #4 the information transferred to Health Current must be actual patient data; the transfer of test data does not fulfill these requirements. It must include all patient data, including behavioral health data and data covered by 42 CFR Part 2.

## **Other Hospitals and Inpatient Facilities**

### **Returning CYE 2019 DAP Participants**

*\*\* Note: Other hospitals and inpatient facilities do not have the immunization data submission requirement that the acute hospitals have, since these facilities generally do not provide immunizations to patients.*

#### **Base requirement:**

The hospital must already have in place an active participation agreement with Health Current and must maintain the CYE 2019 data submission requirements throughout CYE 2020.

## **Other Hospitals and Inpatient Facilities**

### **Returning CYE 2019 DAP Participants (continued)**

#### **Milestone #1:**

No later than October 1, 2019 the hospital must approve and authorize a formal SOW with a qualifying HIE organization to initiate and complete a data quality profile to be produced by a qualifying HIE organization.

#### **Milestone #2:**

No later than January 1, 2020 the hospital must complete the initial data quality profile with a qualifying HIE organization.

## Integrated Clinics

By May 15, 2019, the clinic must have executed an agreement with Health Current and electronically submitted actual patient identifiable information, including both a registration event as well as an encounter summary, to the production environment of the qualifying HIE organization. The clinic must maintain this HIE requirement through September 30, 2020.

If a clinic is in the process of integrating a new Practice Management and Electronic Health Record system, then it may have until September 1, 2019 to electronically submit actual patient identifiable information, including both a registration event as well as an encounter summary, to the production environment of the qualifying HIE organization.

### **NOTE:**

The information transferred to the qualifying HIE organization must be actual patient data; the transfer of test data does not fulfill this requirement. It must include all patient data, including behavioral health data and data covered by 42 CFR Part 2.

# Participant vs. Health Current: Roles & Responsibilities



# Milestones, Deadlines, Roles & Responsibilities

As noted in previous slides, milestones vary based on your provider type.

Health Current created a fact sheet that, for each HIE milestone referenced in the CYE2020 DAP Final Public Notice, there is a description of the respective roles and responsibilities for both Health Current and the AHCCCS participating provider.

Simply review the milestones that apply to your organization and review the respective roles and responsibilities to determine what steps and activities must be completed to achieve the milestone.

If you have any questions:

- Contact your Health Current Account Manager if you are already an active HIE Participant
- Contact Jayme Pina, Health Current's recruitment manager at [recruitment@healthcurrent.org](mailto:recruitment@healthcurrent.org) if you are not yet an HIE Participant



# Milestone: Execute an Agreement

## Participant

- Initiate contact with Health Current as soon as possible
- Review participation agreement
- Authorized representative to execute agreement
- Return agreement to Health Current by Friday, July 26, 2019, to ensure full execution by July 31, 2019 deadline

## Health Current

- Create customized participation agreement
- Fully execute agreement after received by participant
- Introduce participant to assigned Health Current account manager, for service implementation

**NOTE:** Health Current rarely agrees to changes to its participation agreement, due to the fact the agreement has interconnecting requirements among all HIE participants and over 600 Arizona healthcare organizations have signed the agreement.

# Milestone: Approve & Authorize SOW for Data Exchange

## Participant

- Inform your Health Current Account Manager you intend to meet DAP requirements
- Collaborate with Health Current on drafting of SOW
- Agree to project details, including timelines, vendor commitments and resource assignments
- Sign off on the SOW prior to the October 31, 2019 deadline

## Health Current

- Account manager will develop SOW in collaboration with participant
- SOW will be based on standard template created by Health Current and will include, but is not limited to, timelines, vendor commitments and resource assignments

## **Milestone: Electronically Submit ADT Information**

### **Participant**

- Along with any vendor partners, complete activities described and agreed to in the aforementioned SOW related to interface development and ADT data submission
- Important for Participant to stay engaged and meet all SOW deadlines and requirements in order to meet the March 31, 2020 deadline

### **Health Current**

- Provide Participant with detailed technical specifications listing the types of data required for submission within each category noted
- Assign resources and complete all agreed upon SOW timelines and activities, to ensure that Participant meets March 31, 2020 deadline.

## **Milestone: Electronically Submit Add'l Data**

### **Participant**

- Along with any vendor partners, complete activities described and agreed to in the aforementioned SOW related to interface development and related data submission
- It is important for Participant to stay engaged and meet all SOW deadlines and requirements in order to meet the June 30, 2020 deadline.

### **Health Current**

- Provide Participant with detailed technical specifications listing the types of data required for submission within each category noted
- Assign resources and complete all agreed upon SOW timelines and activities, to ensure that Participant meets June 30, 2020 deadline

## **Milestone: Electronically Submit Immunization Data**

### **Participant**

- Along with any vendor partners, complete activities agreed to in collaboration with Health Current to add immunization data to the interface previously developed.
- It is important for Participant to stay engaged and meet all agreed upon deadlines and requirements in order to meet the June 30, 2020 deadline

### **Health Current**

- Provide Participant with detailed technical specifications for immunization data submission
- Assign resources and complete all agreed upon timelines and activities, to ensure that Participant meets the July 1, 2019 immunization data submission deadline

# Milestone: Approve & Authorize SOW for Data Quality Profile

## Data Quality Profile Definition

- An assessment/analysis of the completeness, including standardization, of the data sent from the Participant to the HIE
- Based on the data submission requirements met in earlier milestones
- Purpose: to identify any gaps in the data being sent from the Participant
- Intent is for Participant to initiate work internally as a result, to close those gaps and ensure completeness of their data
- Creating data quality profiles for all HIE data suppliers and subsequently working to improve the data quality of all data submitted to the HIE is a core component of Health Current's Data Quality Strategy

## **Milestone: Approve & Authorize SOW for Data Quality Profile (continued)**

### **Participant**

- Work with Health Current Account Manager to review and finalize SOW
- Approve final SOW, in advance of the October 1, 2019 deadline

### **Health Current**

- Draft the participant's data quality profile SOW, based on a standard template created by Health Current
- Review draft with participant, and revise as needed, to ensure agreement with all activities, timelines and resource assignments

## **Milestone: Complete Initial Data Quality Profile**

### **Participant**

- Collaborate with Health Current on any required activities, in order for Health Current to complete the initial data quality profile for the Participant
- Once data quality profile is received, participant will collaboratively review the gaps identified with Health Current and develop work plan to address the gaps

### **Health Current**

- Utilize data sets sent in by the Participant to create the initial data quality profile
- Share profile with participant and discuss any gaps in data segments, such that the participant can work internally to close identified gaps



## Milestone: Complete Final Data Quality Profile

### Participant

- Work with Health Current to mitigate issues and reduce data gaps identified in the initial data quality profile
- Work with Health Current Account Manager to complete the SOW by supporting Health Current's production of the final data quality profile

### Health Current

- Complete activities outlined in the SOW document and produce final data quality profile
- Assign resources to meet all agreed upon SOW timelines and activities, to ensure that Participant meets March 31, 2020 deadline

# Q & A



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