Performance Evaluation Report

San Francisco Health Plan

July 1, 2013–June 30, 2014

Managed Care Quality and Monitoring Division
California Department of Health Care Services

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Purpose of Report

The Department of Health Care Services (DHCS) administers California's Medicaid program (Medi-Cal), which provides managed health care services to more than 7.7 million beneficiaries (as of June 2014)[1] in the State of California through a combination of contracted full-scope and specialty managed care health plans (MCPs). DHCS is responsible for assessing the quality of care delivered to beneficiaries through its contracted MCPs, making improvements to care and services, and ensuring that contracted MCPs comply with federal and State standards.

The Code of Federal Regulations (CFR) at 42 CFR §438.364[2] requires that states use an external quality review organization (EQRO) to prepare an annual, independent technical report that analyzes and evaluates aggregated information on the health care services provided by the states' Medicaid MCPs. The EQRO's performance evaluation centers on federal and state-specified criteria that fall into the domains of quality, access, and timeliness and includes designation of one or more domains of care for each area reviewed as part of the compliance review process, each performance measure, and each quality improvement project (QIP). The report must contain an assessment of the strengths and weaknesses with respect to the quality and timeliness of, and access to health care services furnished to Medicaid recipients; provide recommendations for improvement; and assess the degree to which the MCPs addressed any previous recommendations.

DHCS contracted with Health Services Advisory Group, Inc. (HSAG), an EQRO, to prepare the external quality review technical report on the Medi-Cal Managed Care program (MCMC). Due to the large number of contracted MCPs and evaluative text, HSAG produced an aggregate technical report and MCP-specific reports separately. The reports are issued in tandem as follows:

- The *Medi-Cal Managed Care Technical Report, July 1, 2013–June 30, 2014*. This report provides an overview of the objectives and methodology for conducting the EQRO review. It includes an aggregate assessment of MCPs' performance through organizational structure and operations,

[1] *Medi-Cal Managed Care Enrollment Report—June 2014*. Available at: http://www.dhcs.ca.gov/dataandstats/reports/Pages/MMCDMonthlyEnrollment.aspx.

[2] Department of Health and Human Services, Centers for Medicare & Medicaid Services. *Federal Register*/Vol. 68, No. 16/Friday, January 23, 2003/Rules and Regulations, p. 3597. 42 CFR Parts 433 and 438 Medicaid Program; External Quality Review of Medicaid Managed Care Organizations, Final Rule.

performance measures, QIPs, and optional activities, including member satisfaction survey and encounter data validation results, as they relate to the quality, access, and timeliness domains of care.

- MCP-specific evaluation reports (July 1, 2013–June 30, 2014). Each report includes findings for an MCP regarding its organizational structure and operations, performance measures, QIPs, and optional activities, including member satisfaction survey and encounter data validation results, as they relate to the quality, access, and timeliness domains of care.

This report is specific to DHCS's contracted MCP, San Francisco Health Plan ("SFHP" or "the MCP"), for the review period July 1, 2013, through June 30, 2014. Actions taken by the MCP subsequent to June 30, 2014, regarding findings identified in this report will be included in the next annual MCP-specific evaluation report.

Managed Care Health Plan Overview

SFHP is a full-scope MCP delivering services to its MCMC members as a "Local Initiative" (LI) MCP under the Two-Plan Model (TPM). In TPM counties, MCMC beneficiaries may choose between two MCPs; typically, one MCP is an LI and the other a CP. DHCS contracts with both plans. The LI is established under authority of the local government with input from State and federal agencies, local community groups, and health care providers to meet the needs and concerns of the community. The CP is a private insurance plan that also provides care for Medi-Cal beneficiaries. MCMC beneficiaries may enroll in SFHP; the LI MCP; or in Anthem Blue Cross Partnership Plan, the alternative CP.

SFHP became operational in San Francisco County to provide MCMC services effective January 1997. As of June 30, 2014, SFHP had 97,076 MCMC members.[3]

[3] *Medi-Cal Managed Care Enrollment Report—June 2014*. Available at: http://www.dhcs.ca.gov/dataandstats/reports/Pages/MMCDMonthlyEnrollment.aspx

Conducting the EQRO Review

The Code of Federal Regulations (CFR) at 42 CFR §438.358 specifies that the state or its EQRO must conduct a comprehensive review within a three-year period to determine a Medicaid MCP's compliance with standards established by the state related to enrollee rights and protections, access to services, structure and operations, measurement and improvement, and grievance system standards. DHCS conducts this review activity through an extensive monitoring process that assesses MCPs' compliance with State and federal requirements at the point of initial contracting and through subsequent, ongoing monitoring activities.

This report section covers review activities for DHCS's joint medical audit and its Seniors and Persons with Disabilities (SPD) medical survey. These reviews often occur independently, and while some areas of review are similar, the results are separate and distinct.

The *Medi-Cal Managed Care Technical Report, July 1, 2013–June 30, 2014*, provides an overview of the objectives and methodology for conducting the EQRO review.

Assessing the State's Compliance Review Activities

HSAG organized, aggregated, and analyzed results from DHCS's medical audit/SPD medical survey reviews to draw conclusions about each MCP's performance in providing quality, accessible, and timely health care and services to its MCMC members. For this report, HSAG reviewed the most current joint medical audits/SPD medical survey reports available as of June 30, 2014. In addition, HSAG reviewed each MCP's quality improvement program description, quality improvement program evaluation, and quality improvement work plan, as available and applicable, to evaluate key activities between formal comprehensive reviews. For newly established MCPs, HSAG reviewed DHCS's readiness review materials.

Readiness Reviews

DHCS aids MCP readiness through review and approval of MCPs' written policies and procedures. DHCS's MCP contracts reflect federal and State requirements. DHCS reviews and approves MCP processes prior to the commencement of MCP operations, during MCP expansion into new counties, upon contract renewal, and when MCPs revise their policies and procedures.

Medical Audits and SPD Medical Surveys

Historically, DHCS and the Department of Managed Health Care (DMHC) collaborated to conduct joint medical audits of Medi-Cal MCPs. In some instances, however, these audits were conducted solely by DHCS or DMHC. These medical audits, which are conducted for each Medi-Cal MCP approximately once every three years, assess MCPs' compliance with contract requirements and State and federal regulations.

DHCS received authorization "1115 Waiver" from the federal government to conduct mandatory enrollment of SPDs into managed care to achieve care coordination, better manage chronic conditions, and improve health outcomes in non-County Organized Health System (COHS) counties. DHCS entered into an Interagency Agreement with DMHC to conduct health plan medical surveys to ensure that enrollees affected by this mandatory transition are assisted and protected under California's strong patients' rights laws. Mandatory enrollment for these beneficiaries began in June 2011.

During this review period, DHCS began a transition of medical monitoring processes to enhance oversight of MCPs. Two primary changes occurred. First, DHCS's Audits & Investigation Division (A&I) began transitioning its medical audit frequency from once every three years to once a year. These reviews were replaced with the A&I annual medical audit and DMHC's SPD medical survey every three years.

Under DHCS's new monitoring protocols, any deficiencies identified in either A&I medical audits or DMHC SPD medical surveys and other monitoring-related MCP examinations are actively and continuously monitored until full resolution is achieved. Monitoring activities under the new protocols include identifying root causes of MCP issues, augmented by DHCS technical assistance to MCPs; imposing a corrective action plan (CAP) to address any deficiencies; and imposing sanctions and/or penalties, when necessary.

The most recent medical audit with SFHP was conducted March 3, 2014, through March 20, 2014. The audit report was not finalized in time for inclusion in this report. HSAG will include a summary of the audit in SFHP's 2014–15 MCP-specific evaluation report.

The most recent SPD medical survey with the MCP was conducted March 20, 2012, through March 23, 2012, and DMHC conducted a routine medical survey at the same time. Additionally, DHCS conducted a routine monitoring review with the MCP May 29, 2012, through May 31, 2012. HSAG included a summary of these reviews in the MCP's 2012–13 MCP-specific evaluation report.

Strengths

SFHP has no outstanding findings from the 2012 surveys conducted by DHCS.

Opportunities for Improvement

Since the report of the most recent SFHP medical audit was not finalized in time for inclusion here, HSAG has no recommendations for opportunities for improvement related to compliance reviews.

Conducting the EQRO Review

DHCS annually selects a set of performance measures for the Medi-Cal full-scope MCPs to evaluate the quality of care delivered by the contracted MCPs to Medi-Cal Managed Care program (MCMC) beneficiaries. DHCS consults with contracted MCPs, the EQRO, and stakeholders to determine what measures the MCPs will be required to report. The DHCS-selected measures are referred to as the External Accountability Set. DHCS requires that MCPs collect and report External Accountability Set rates, which provides a standardized method for objectively evaluating MCPs' delivery of services.

HSAG conducts validation of the External Accountability Set performance measures as required by DHCS to evaluate the accuracy of the MCPs' reported results. Validation determines the extent to which MCPs followed specifications established by DHCS for its External Accountability Set-specific performance measures when calculating rates.

The *Medi-Cal Managed Care Technical Report, July 1, 2013–June 30, 2014*, provides an overview of the objectives and methodology for conducting the EQRO review.

Validating Performance Measures and Assessing Results

The Centers for Medicare & Medicaid Services (CMS) requires that states conduct performance measure validation of their contracted health plans to ensure that plans calculate performance measure rates according to state specifications. CMS also requires that states assess the extent to which the plans' information systems (IS) provide accurate and complete information.

To comply with the CMS requirement, DHCS contracts with HSAG to conduct validation of the selected External Accountability Set performance measures. HSAG evaluates two aspects of performance measures for each MCP. First, HSAG assesses the validity of each MCP's data using protocols required by CMS.[4] This process is referred to as performance measure validation. Then, HSAG organizes, aggregates, and analyzes validated performance measure data to draw conclusions about the MCP's performance in providing quality, accessible, and timely care and services to its MCMC members.

[4] The CMS EQR Protocols can be found at http://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Quality-of-Care/Quality-of-Care-External-Quality-Review.html.

Performance Measure Validation

DHCS's 2014 External Accountability Set consisted of 14 Healthcare Effectiveness Data and Information Set (HEDIS®)[5] measures and 1 measure developed by DHCS and the MCPs, with guidance from the EQRO, to be used for the statewide collaborative QIP. Several of the 14 required measures include more than one indicator, bringing the total performance measure rates required for MCP reporting to 32. In this report, "performance measure" or "measure" (rather than indicator) is used to describe the required External Accountability Set measures. The performance measures fell under all three domains of care—quality, access, and timeliness.

HSAG performed NCQA HEDIS Compliance Audits™[6] of all Medi-Cal MCPs in 2014 to determine whether the MCPs followed the appropriate specifications to produce valid rates. The audits were conducted in accordance with the *2014 NCQA HEDIS Compliance Audit: Standards, Policies, and Procedures, Volume 5*. NCQA specifies IS standards that detail the minimum requirements that health plans must meet, including the criteria for any manual processes used to report HEDIS information. When a Medi-Cal MCP did not meet a particular IS standard, the audit team evaluated the impact on HEDIS reporting capabilities. MCPs not fully compliant with all of the IS standards could still report measures as long as the final reported rates were not significantly biased. As part of the HEDIS Compliance Audit, HSAG also reviewed and approved the MCPs' source code, either internal or vendor created, for the *All-Cause Readmissions* statewide collaborative QIP measure, since this measure is not certified under software certification for Medicaid.

Performance Measure Validation Findings

The *HEDIS 2014 Compliance Audit Final Report of Findings for San Francisco Health Plan* contains the detailed findings and recommendations from HSAG's HEDIS audit. HSAG auditors determined that SFHP followed the appropriate specifications to produce valid rates, and no issues of concern were identified. A brief summary of the findings is included below.

- SFHP continued its robust member and provider incentive programs.
- During the previous audit year, SFHP had duplicated listings for a number of members in its database. The MCP corrected this issue during the 2013 measurement year, resulting in no impact on the 2014 HEDIS measure rates.
- Although SFHP experienced an increase in providers during the measurement year, the MCP experienced no backlogs in processing the provider information.

[5] HEDIS® is a registered trademark of the National Committee for Quality Assurance (NCQA).
[6] NCQA HEDIS Compliance Audit™ is a trademark of the National Committee for Quality Assurance (NCQA).

Performance Measure Results

After validating the MCP's performance measure rates, HSAG assessed the results. Table 3.1 presents a summary of SFHP's performance measure results for 2011–14. Note that data may not be available for all four years.

To create a uniform standard for assessing MCPs on DHCS-required performance measures, DHCS established a minimum performance level (MPL) and a high performance level (HPL) for each measure, except for utilization measures, first-year measures, or measures that had significant specification changes impacting comparability. In addition to the performance measure results from 2011–14, Table 3.1 shows the MCP's performance compared to the DHCS-established MPLs and HPLs for each year. Rates below the MPLs are **bolded**, and rates above the HPLs are shaded in gray.

DHCS based the MPLs and HPLs on the NCQA's national percentiles. MPLs and HPLs align with NCQA's national Medicaid 25th percentile and 90th percentile, respectively, except for the *CDC–H9 (>9.0 percent)* measure. For the *CDC–H9 (>9.0 percent)* measure, a low rate indicates better performance, and a high rate indicates worse performance. For this measure only, the established MPL is based on the Medicaid 75th percentile, and the HPL is based on the national Medicaid 10th percentile.

The reader should note the following regarding Table 3.1:

- The *All-Cause Readmissions* measure is a non-HEDIS measure used for the ACR collaborative QIP; therefore, no MPL or HPL is established for this measure.
- For the *All-Cause Readmissions* measure, a lower rate indicates better performance (i.e., fewer readmissions).
- The *Ambulatory Care—Emergency Department (ED) Visits* and *Ambulatory Care—Outpatient Visits* measures are utilization measures. No MPL or HPL is established for a utilization measure. Additionally, HSAG did not compare performance for these measures.
- Although MPL and HPL information is provided, as applicable, for the following measures, DHCS did not hold MCPs accountable to meet the MPLs for the measures for 2014:
  - All four *Children and Adolescents' Access to Primary Care* measures.
  - *Cervical Cancer Screening*. Note: MCPs have reported a rate for the *Cervical Cancer Screening* measure since 2008; however, due to NCQA's HEDIS 2014 specification changes to reflect the new screening guidelines, this measure was considered to be a first-year measure in 2014. Consequently, HSAG did not include or make comparisons to previous years' rates in this report.
  - *Comprehensive Diabetes Care—LDL-C Control.* (This measure is being eliminated for HEDIS 2015.)
  - *Comprehensive Diabetes Care—LDL-C Screening.* (This measure is being eliminated for HEDIS 2015.)

Table 3.1—Performance Measure Results
SFHP—San Francisco County

Measure[1]	Domain of Care[2]	2011[3]	2012[4]	2013[5]	2014[6]	2013–14 Rate Difference[7]
All-Cause Readmissions—Statewide Collaborative QIP Measure	Q, A	—	—	15.81%	13.86%	↔
*Ambulatory Care—Emergency Department Visits per 1,000 Member Months**	‡	—	26.68	35.34	33.03	Not Tested
*Ambulatory Care—Outpatient Visits per 1,000 Member Months**	‡	—	354.39	348.95	383.10	Not Tested
Annual Monitoring for Patients on Persistent Medications—ACE Inhibitors or ARBs	Q	—	**73.20%**	**76.81%**	87.32%	↑
Annual Monitoring for Patients on Persistent Medications—Digoxin	Q	—	NA	**81.82%**	95.92%	↑
Annual Monitoring for Patients on Persistent Medications—Diuretics	Q	—	**71.43%**	**78.74%**	86.31%	↑
Avoidance of Antibiotic Treatment in Adults With Acute Bronchitis	Q	44.53%	45.45%	53.75%	44.01%	↓
Cervical Cancer Screening	Q,A	—	—	—	74.47%	Not Comparable
Childhood Immunization Status—Combination 3	Q,A,T	87.27%	87.04%	85.81%	85.42%	↔
Children and Adolescents' Access to Primary Care Practitioners—12 to 24 Months	A	—	**92.98%**	95.95%	97.01%	↔
Children and Adolescents' Access to Primary Care Practitioners—25 Months to 6 Years	A	—	87.90%	89.57%	92.55%	↑
Children and Adolescents' Access to Primary Care Practitioners—7 to 11 Years	A	—	90.08%	93.16%	94.70%	↑
Children and Adolescents' Access to Primary Care Practitioners—12 to 19 Years	A	—	86.78%	91.13%	91.04%	↔
Comprehensive Diabetes Care—Blood Pressure Control (<140/90 mm Hg)	Q	73.71%	78.64%	74.77%	76.57%	↔
Comprehensive Diabetes Care—Eye Exam (Retinal) Performed	Q,A	70.10%	69.72%	67.59%	62.41%	↔
Comprehensive Diabetes Care—HbA1c Testing	Q,A	90.38%	91.08%	90.97%	89.33%	↔
Comprehensive Diabetes Care—HbA1c Control (<8.0 Percent)	Q	64.09%	63.38%	62.27%	63.57%	↔
Comprehensive Diabetes Care—LDL-C Control (<100 mg/dL)	Q	47.94%	48.83%	47.69%	47.80%	↔
Comprehensive Diabetes Care—LDL-C Screening	Q,A	83.16%	83.33%	80.56%	79.35%	↔
Comprehensive Diabetes Care—Medical Attention for Nephropathy	Q,A	85.05%	83.57%	87.73%	86.77%	↔
Comprehensive Diabetes Care—HbA1c Poor Control (>9.0 Percent)	Q	26.29%	26.53%	26.39%	24.36%	↔
Controlling High Blood Pressure	Q	—	—	66.46%	63.42%	↔
Immunizations for Adolescents—Combination 1	Q,A,T	—	64.35%	81.02%	81.71%	↔
Medication Management for People with Asthma—Medication Compliance 50% Total	Q	—	—	**42.82%**	52.10%	↑
Medication Management for People with Asthma—Medication Compliance 75% Total	Q	—	—	**21.55%**	32.87%	↑

Measure[1]	Domain of Care[2]	2011[3]	2012[4]	2013[5]	2014[6]	2013–14 Rate Difference[7]
Prenatal and Postpartum Care—Postpartum Care	Q,A,T	63.57%	75.64%	71.76%	70.40%	↔
Prenatal and Postpartum Care—Timeliness of Prenatal Care	Q,A,T	90.26%	93.44%	87.96%	93.24%	↑
Use of Imaging Studies for Low Back Pain	Q	82.23%	82.98%	86.53%	84.86%	↔
Weight Assessment and Counseling for Nutrition and Physical Activity for Children/Adolescents—BMI Assessment: Total	Q	60.65%	76.16%	85.19%	86.81%	↔
Weight Assessment and Counseling for Nutrition and Physical Activity for Children/Adolescents—Nutrition Counseling: Total	Q	78.47%	80.56%	85.19%	82.41%	↔
Weight Assessment and Counseling for Nutrition and Physical Activity for Children/Adolescents—Physical Activity Counseling: Total	Q	70.37%	72.69%	83.80%	79.17%	↔
Well-Child Visits in the Third, Fourth, Fifth, and Sixth Years of Life	Q,A,T	85.19%	84.95%	84.26%	86.81%	↔

[1] DHCS-selected HEDIS performance measures developed by the National Committee for Quality Assurance (NCQA), with the exception of the *All-Cause Readmissions* measure, which was developed by DHCS for the statewide collaborative QIP.
[2] HSAG's assignment of performance measures to the domains of care for quality (Q), access (A), and timeliness (T).
[3] 2011 rates reflect measurement year data from January 1, 2010, through December 31, 2010.
[4] 2012 rates reflect measurement year data from January 1, 2011, through December 31, 2011.
[5] 2013 rates reflect measurement year data from January 1, 2012, through December 31, 2012.
[6] 2014 rates reflect measurement year data from January 1, 2013, through December 31, 2013.
[7] Performance comparisons are based on the Chi-Square test of statistical significance with a *p* value of <0.05.
‡ This is a utilization measure, which is not assigned a domain of care.
-- Indicates the rate is not available.
↓ = Statistically significant decline.
↔ = No statistically significant change.
↑ = Statistically significant improvement.
▲▼ are used to indicate performance differences for the *All-Cause Readmissions* and *Comprehensive Diabetes Care—HbA1c Poor Control (>9.0%)* measures, where a decrease in the rate indicates better performance. A downward triangle (▼) denotes a significant *decline* in performance, as denoted by a significant increase in the 2014 rate from the 2013 rate. An upward triangle (▲) denotes significant *improvement* in performance, as indicated by a significant decrease of the 2014 rate from the 2013 rate.
NA = A *Not Applicable* audit finding because the MCP's denominator was too small to report (less than 30).

Seniors and Persons with Disabilities Performance Measure Results

In response to Welfare and Institutions (W&I) Code, Section 14182(b)(17),[7] DHCS required full-scope MCPs, effective 2013, to report a separate rate for their Seniors and Persons with Disabilities (SPD) population for a selected group of performance measures (SPD measures). Reporting on these measures assists DHCS with assessing performance related to the

[7] Senate Bill 208 (Steinberg et al, Chapter 714, Statutes of 2010) added W&I Code 14182(b)(17), which provides that DHCS shall develop performance measures that are required as part of the contract to provide quality indicators for the Medi-Cal population enrolled in a managed care health plan and for the subset of enrollees who are seniors and persons with disabilities. Managed care health plan performance measures may include measures from HEDIS; measures indicative of performance in serving special needs populations, such as the NCQA Structure and Process measures; or both.

implementation of the mandatory enrollment of Medi-Cal only SPDs into managed care. This enrollment began June 2011 and was completed by June 2012.

The SPD measures were selected by DHCS clinical staff in consultation with HSAG and stakeholders (selection team), as part of DHCS's annual HEDIS measures selection process. The selection team considered conditions seen frequently in the senior population and reflected in measures such as *All-Cause Readmissions, Annual Monitoring for Patients on Persistent Medications*, and *Comprehensive Diabetes Care*. The selection team also considered measures that could reflect possible access issues which could be magnified in the SPD population, such as *Children and Adolescents' Access to Primary Care Practitioners*.

The final selected SPD measures are listed below. Following the list of measures are Table 3.2 and Table 3.3, which present a summary of SFHP's 2014 SPD measure results. Table 3.2 presents the non-SPD and SPD rates, a comparison of the non-SPD and SPD rates,[8] and the total combined rate for all measures except the *Ambulatory Care* measures. Table 3.3 presents the non-SPD and SPD rates for the *Ambulatory Care—Emergency Department (ED) Visits* and *Ambulatory Care—Outpatient Visits* measures. Appendices A and B include tables displaying the two-year trending information for the SPD and non-SPD populations for all measures that DHCS required the MCPs to stratify for the SPD population. The SPD trending information is included in Appendix A and the non-SPD trending information is included in Appendix B.

- *All-Cause Readmissions—Statewide Collaborative QIP*
- *Ambulatory Care—Outpatient Visits*
- *Ambulatory Care—Emergency Department Visits*
- *Annual Monitoring for Patients on Persistent Medications—ACE Inhibitors or ARBs*
- *Annual Monitoring for Patients on Persistent Medications—Digoxin*
- *Annual Monitoring for Patients on Persistent Medications—Diuretics*
- *Children and Adolescents' Access to Primary Care Practitioners—12 to 24 Months*
- *Children and Adolescents' Access to Primary Care Practitioners—25 Months to 6 Years*
- *Children and Adolescents' Access to Primary Care Practitioners—7 to 11 Years*
- *Children and Adolescents' Access to Primary Care Practitioners—12 to 19 Years*
- *Comprehensive Diabetes Care—Blood Pressure Control (<140/90 mm Hg)*
- *Comprehensive Diabetes Care—Eye Exam (Retinal) Performed*
- *Comprehensive Diabetes Care—HbA1c Control (<8.0 Percent)*
- *Comprehensive Diabetes Care—HbA1c Poor Control (>9.0 Percent)*
- *Comprehensive Diabetes Care—HbA1c Testing*
- *Comprehensive Diabetes Care—LDL-C Control (<100 mg/dL)*

[8] HSAG calculated statistical significance testing between the SPD and non-SPD rates for each measure using a Chi-square test. This information is displayed in the "SPD Compared to Non-SPD" column in Table 3.2.

- *Comprehensive Diabetes Care—LDL-C Screening*
- *Comprehensive Diabetes Care—Medical Attention for Nephropathy*

Table 3.2—2014 Performance Measure Comparison and Results for Measures Stratified by the SPD Population for SFHP—San Francisco County

Performance Measure	Non-SPD Rate	SPD Rate	SPD Compared to Non-SPD*	Total Rate (Non-SPD and SPD)
All-Cause Readmissions—Statewide Collaborative QIP Measure	5.69%	17.88%	▼	13.86%
Annual Monitoring for Patients on Persistent Medications—ACE Inhibitors or ARBs	86.25%	87.62%	↔	87.32%
Annual Monitoring for Patients on Persistent Medications—Digoxin	NA	95.12%	Not Comparable	95.92%
Annual Monitoring for Patients on Persistent Medications—Diuretics	83.72%	86.98%	↔	86.31%
Children and Adolescents' Access to Primary Care Practitioners—12 to 24 Months	97.04%	NA	Not Comparable	97.01%
Children and Adolescents' Access to Primary Care Practitioners—25 Months to 6 Years	92.69%	83.33%	↓	92.55%
Children and Adolescents' Access to Primary Care Practitioners—7 to 11 Years	94.85%	89.41%	↓	94.70%
Children and Adolescents' Access to Primary Care Practitioners—12 to 19 Years	91.16%	86.96%	↓	91.04%
Comprehensive Diabetes Care—Blood Pressure Control (<140/90 mm Hg)	76.80%	69.91%	↓	76.57%
Comprehensive Diabetes Care—Eye Exam (Retinal) Performed	69.14%	62.27%	↓	62.41%
Comprehensive Diabetes Care—HbA1c Testing	88.63%	88.43%	↔	89.33%
Comprehensive Diabetes Care—HbA1c Control (<8.0 Percent)	66.13%	65.05%	↔	63.57%
Comprehensive Diabetes Care—LDL-C Control (<100 mg/dL)	51.04%	47.92%	↔	47.80%
Comprehensive Diabetes Care—LDL-C Screening	80.51%	78.24%	↔	79.35%
Comprehensive Diabetes Care—Medical Attention for Nephropathy	85.38%	85.42%	↔	86.77%
Comprehensive Diabetes Care—HbA1c Poor Control (>9.0 Percent)	22.27%	23.84%	↔	24.36%

* HSAG calculated statistical significance testing between the SPD and non-SPD rates for each measure using a Chi-square test.

↑ = SPD rates in 2014 were significantly higher than the non-SPD rates.

↓ = SPD rates in 2014 were significantly lower than the non-SPD rates.

↔ = SPD rates in 2014 were not significantly different than the non-SPD rates.

▲▼ are used to indicate performance differences for *All-Cause Readmissions* and *Comprehensive Diabetes Care—HbA1c Poor Control (>9.0%)* where a decrease in the rate indicates better performance.

▼ denotes significantly *lower* performance, as denoted by a significantly higher SPD rate than the non-SPD rate.

▲ denotes significantly *higher* performance, as indicated by a significantly lower SPD rate than the non-SPD rate.

Not comparable = A rate comparison could not be made because data were not available for both populations.

Table 3.3—2014 Non-SPD and SPD Rates for Ambulatory Care Measures
SFHP—San Francisco County

Non-SPD Visits/1,000 Member Months*		SPD Visits/1,000 Member Months*	
Outpatient Visits	Emergency Department Visits	Outpatient Visits	Emergency Department Visits
330.07	23.26	615.01	75.73

*Member months are a member's "contribution" to the total yearly membership.

Performance Measure Result Findings

SFHP had 14 measures with rates above the HPLs, and no rates in 2014 were below the MPLs. The following eight measures had rates above the HPLs for the fourth consecutive year:

- *Avoidance of Antibiotic Treatment in Adults With Acute Bronchitis*
- *Childhood Immunization Status—Combination 3*
- *Comprehensive Diabetes Care—HbA1c Control (<8.0 Percent)*
- *Comprehensive Diabetes Care—LDL-C Control (<100 mg/dL)*
- *Comprehensive Diabetes Care—HbA1c Poor Control (>9.0 Percent)*
- *Weight Assessment and Counseling for Nutrition and Physical Activity for Children/Adolescents—Nutrition Counseling: Total*
- *Weight Assessment and Counseling for Nutrition and Physical Activity for Children/Adolescents—Physical Activity Counseling: Total*
- *Well-Child Visits in the Third, Fourth, Fifth, and Sixth Years of Life*

Two measures had rates above the HPLs for the third consecutive year:

- *Use of Imaging Studies for Low Back Pain*
- *Weight Assessment and Counseling for Nutrition and Physical Activity for Children/Adolescents—BMI Assessment: Total*

The rates for the following eight measures improved significantly from 2013 to 2014:

- All three *Annual Monitoring for Patients on Persistent Medications* measures, resulting in the rates for the *ACE Inhibitors and ARBs* and *Diuretics* indicators moving from below the MPLs in 2013 to above the MPLs in 2014 and the *Digoxin* indicator moving from below the MPL in 2013 to above the HPL in 2014.
- *Children and Adolescents' Access to Primary Care Practitioners—25 Months to 6 Years*

- *Children and Adolescents' Access to Primary Care Practitioners—7 to 11 Years*
- Both *Medication Management for People with Asthma* measures, resulting in the rates moving from below the MPLs in 2013 to above the MPLs in 2014. Note: Since 2013 was the first year DHCS required these measures to be reported, DHCS did not hold the MCP accountable to meet the MPLs in 2013.
- *Prenatal and Postpartum Care—Timeliness of Prenatal Care*

Although the rate for the *Avoidance of Antibiotic Treatment in Adults With Acute Bronchitis* measure declined significantly from 2013 to 2014, it remained above the HPL.

Seniors and Persons with Disabilities Findings

No SPD rates were significantly better than the non-SPD rates, and the SPD rates were significantly worse than the non-SPD rates for the following six measures:

- *All-Cause Readmissions*
- *Children and Adolescents' Access to Primary Care Practitioners—25 Months to 6 Years*
- *Children and Adolescents' Access to Primary Care Practitioners—7 to 11 Years*
- *Children and Adolescents' Access to Primary Care Practitioners—12 to 19 Years*
- *Comprehensive Diabetes Care—Blood Pressure Control (<140/90 mm Hg)*
- *Comprehensive Diabetes Care—Eye Exam (Retinal) Performed*

The *Ambulatory Care* measures are utilization measures, which can be helpful in reviewing patterns of suspected under- and overutilization of services; however, rates should be interpreted with caution as high and low rates do not necessarily indicate better or worse performance. For this reason, DHCS does not establish performance thresholds for these measures, and HSAG does not provide comparative analysis.

Improvement Plans

MCPs have a contractual requirement to perform at or above DHCS-established MPLs. DHCS assesses each MCP's rates against the MPLs and requires MCPs that have rates below these minimum levels to submit an improvement plan (IP) to DHCS. The purpose of an IP is to develop a set of strategies that will improve the MCP's performance for the particular measure. For each rate that falls below the MPL, the MCP must submit an IP with a detailed description of the highest priority barriers; the steps the MCP will take to improve care and the measure's rate; and the specific, measurable target for the next Plan-Do-Study-Act cycle. DHCS reviews each IP for soundness of design and anticipated effectiveness of the interventions. To avoid redundancy,

if an MCP has an active QIP which addresses a measure with a 2014 rate below the MPL, DHCS allows the MCP to combing its QIP and IP.

For the 2013–14 MCP-specific reports, DHCS reviewed IPs for each MCP that had rates below the MPLs for HEDIS 2013 (measurement year 2012). DHCS also reviewed the HEDIS 2014 rates (measurement year 2013) to assess whether the MCP was successful in achieving the MPLs or progressing toward the MPLs. Additionally, throughout the reporting year, DHCS engaged in monitoring activities with MCPs to assess if the MCPs were regularly assessing progress (at least quarterly) toward achieving desired IP outcomes. Finally, DHCS assessed whether the MCPs would need to continue existing IPs and/or to develop new IPs.

For MCPs with existing IPs and those needing to submit new IPs, DHCS provided HSAG with a summary of each IP that included the barriers the MCP experienced which led to the measure's rate being below the MPL, the interventions the MCP implemented to address the barriers, and outcome information. HSAG provides a summary of each IP below, along with strengths and opportunities for improvement.

Note: DHCS and the MCPs are engaging in new efforts to improve the quality of care for Medi-Cal managed care beneficiaries. These efforts include targeting key quality improvement areas as outlined in California's Medi-Cal Managed Care Quality Strategy Annual Assessment (i.e., immunization, diabetes care, controlling hypertension, tobacco cessation, and postpartum care). MCPs are using a rapid cycle approach (including the Plan-Do-Study-Act cycle) to strengthen these key quality improvement areas and have structured quality improvement resources accordingly. As a result, DHCS may not require an MCP to submit IPs for all measures with rates below the MPLs. MCPs continue to be contractually required to meet MPLs for all External Accountability Set measures.

Assessment of MCP's Improvement Plans

Based on HEDIS 2013 rates, SFHP was required to submit IPs for all three *Annual Monitoring for Patients on Persistent Medications* measures. Following is a summary of the IP and HSAG's assessment of progress the MCP made toward improving the rates for the measures.

Annual Monitoring for Patients on Persistent Medications

SFHP indicated that barriers to the rates for the measures being above the MPLs were that providers were not submitting current procedural terminology (CPT) codes with lab files, were not submitting data, or were inappropriately coding data. The MCP worked with a specific medical group to address barriers of incomplete data and improper coding. Additionally, the MCP worked with each identified provider to resolve data issues. Finally, SFHP provided incentives to providers, clinics, and medical groups to help improve performance on the measures.

SFHP's efforts resulted in the rates for all three measures improving significantly from 2013 to 2014 and all rates being above the MPLs, with the *Digoxin* measure's rate being above the HPL. The MCP will not be required to submit an IP for these measures in 2014.

Since the rates for all measures were above the MPLs in 2014, SFHP will not be required to submit any IPs.

Strengths

HSAG auditors determined that SFHP followed the appropriate specifications to produce valid performance measure rates and identified no issues of concern. The MCP corrected an issue from the previous year related to having duplicate listings for a number of members. Additionally, although SFHP experienced an increase in providers during the 2013 measurement year, the MCP experienced no backlogs in processing provider information.

The MCP had 14 measures with rates above the HPLs, and no measures had rates below the MPLs. Eight measures had rates above the HPLs for the fourth consecutive year, and two measures had rates above the HPLs for the third consecutive year. The rates for eight measures improved significantly from 2013 to 2014, resulting in the rates for five of the measures moving from below the MPLs in 2013 to above the MPLs in 2014. Note that the rate for one of the five measures, *Annual Monitoring for Patients on Persistent Medications—Digoxin*, moved from below the MPL in 2013 to above the HPL in 2014.

SFHP continued to be a high-performing MCP and in 2014 was given the DHCS Bronze Award for its HEDIS performance.

Opportunities for Improvement

SFHP has the opportunity to assess the factors leading to the SPD rates for six measures being significantly worse than the non-SPD rates to ensure that the needs of the SPD population are being met. While SFHP provided HSAG with documentation of actions taken to address the 2013 *All-Cause Readmissions* SPD rate being worse than the non-SPD rate (See Appendix D.), the MCP has the opportunity to assess if and which efforts are making a positive impact as the SPD population continued to have a significantly higher number of readmissions than the non-SPD population in 2014.

Conducting the EQRO Review

The purpose of a quality improvement project (QIP) is to achieve, through ongoing measurements and interventions, significant improvement sustained over time in clinical and nonclinical areas. HSAG reviews each QIP using the CMS validation protocol[9] to ensure that MCPs design, conduct, and report QIPs in a methodologically sound manner and meet all State and federal requirements. As a result of this validation, DHCS and interested parties can have confidence in reported improvements that result from a QIP.

Full-scope MCPs must conduct a minimum of two QIPs. They must participate in the DHCS-led statewide collaborative QIP and conduct an MCP-specific (internal) QIP or an MCP-led small group collaborative QIP. MCPs that hold multiple MCMC contracts or that have a contract that covers multiple counties must conduct two QIPs for each county.

The *Medi-Cal Managed Care Technical Report, July 1, 2013–June 30, 2014,* provides an overview of the objectives and methodology for conducting the EQRO review.

Validating Quality Improvement Projects and Assessing Results

HSAG evaluates two aspects of MCPs' QIPs. First, HSAG evaluates the validity of each QIP's study design, implementation strategy, and study outcomes using CMS-prescribed protocols (QIP validation). Second, HSAG evaluates the efficacy of the interventions in achieving and sustaining improvement of the MCP's QIP objectives (QIP results).

Beginning July 1, 2012, HSAG began using a revised QIP methodology and scoring tool to validate the QIPs. HSAG updated the methodology and tool to place greater emphasis on health care outcomes by ensuring that statistically significant improvement has been achieved before it assesses for sustained improvement. Additionally, HSAG streamlined some aspects of the scoring to make the process more efficient. With greater emphasis on improving QIP outcomes, member health, functional status, and/or satisfaction will be positively affected.

HSAG organized, aggregated, and analyzed SFHP's validated QIP data to draw conclusions about the MCP's performance in providing quality, accessible, and timely care and services to its MCMC members.

[9] The CMS Protocols can be found at http://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Quality-of-Care/Quality-of-Care-External-Quality-Review.html.

Quality Improvement Project Objectives

SFHP participated in the statewide collaborative QIP and had one internal QIP in progress during the review period of July 1, 2013–June 30, 2014.

Table 4.1 below lists SFHP's QIPs and whether the QIP is clinical or nonclinical and the domains of care (i.e., quality, access, timeliness) the QIP addresses.

Table 4.1—Quality Improvement Projects for SFHP
July 1, 2013, through June 30, 2014

QIP	Clinical/Nonclinical	Domains of Care
All-Cause Readmissions	Clinical	Q, A
Improving the Patient Experience	Clinical	Q, A

The *All-Cause Readmissions* statewide collaborative QIP focused on reducing readmissions due to all causes within 30 days of an inpatient discharge for beneficiaries aged 21 years and older. Readmissions have been associated with the lack of proper discharge planning and poor care transition. Reducing readmissions can demonstrate improved follow-up and care management of members leading to improved health outcomes.

SFHP selected two global measures from the Consumer Assessment of Healthcare Providers and Systems (CAHPS®)[10] Survey for use to evaluate and improve the patient experience. The measures chosen were (1) *Rating of Personal Doctor* and (2) *Rating of All Health Care*. By improving doctor-patient communication, SFHP aimed to improve members' satisfaction both with their personal doctors and their overall health care. Improved doctor-patient communication is associated with improved adherence to physician recommendations and improved self-management skills. Note: Since the CAHPS survey is not conducted annually, SFHP does not have the ability to annually determine if the MCP's improvement efforts are resulting in an improvement in patient experience.

Quality Improvement Project Validation Findings

Table 4.2 summarizes the QIP validation results and status across CMS protocol activities during the review period.

[10] CAHPS® is a registered trademark of the Agency for Healthcare Research and Quality (AHRQ).

Table 4.2—Quality Improvement Project Validation Activity
SFHP—San Francisco County
July 1, 2013, through June 30, 2014

Name of Project/Study	Type of Review[1]	Percentage Score of Evaluation Elements *Met*[2]	Percentage Score of Critical Elements *Met*[3]	Overall Validation Status[4]
Statewide Collaborative QIP				
All-Cause Readmissions	Annual Submission	94%	86%	*Partially Met*
	Annual Resubmission 1	100%	100%	*Met*
Internal QIPs				
Improving the Patient Experience	Annual Submission	86%	89%	*Partially Met*
	Annual Resubmission 1	100%	100%	*Met*

[1]**Type of Review**—Designates the QIP review as a proposal, annual submission, or resubmission. A resubmission means the MCP was required to resubmit the QIP with updated documentation because it did not meet HSAG's validation criteria to receive an overall *Met* validation status.

[2]**Percentage Score of Evaluation Elements *Met***—The percentage score is calculated by dividing the total elements *Met* (critical and noncritical) by the sum of the total elements of all categories (*Met*, *Partially Met*, and *Not Met)*.

[3]**Percentage Score of Critical Elements *Met***—The percentage score of critical elements *Met* is calculated by dividing the total critical elements *Met* by the sum of the critical elements *Met*, *Partially Met*, and *Not Met*.

[4]**Overall Validation Status**—Populated from the QIP Validation Tool and based on the percentage scores and whether critical elements were *Met*, *Partially Met*, or *Not Met*.

Validation results during the review period of July 1, 2013, through June 30, 2014, showed that SFHP's annual submission of its *All-Cause Readmissions* QIP received an overall validation status of *Partially Met*. As of July 1, 2009, DHCS has required MCPs to resubmit their QIPs until they have achieved an overall *Met* validation status. Based on HSAG's validation feedback, SFHP resubmitted the QIP and achieved an overall *Met* validation status, with 100 percent of the evaluation elements (critical and noncritical) receiving a met score. SFHP's *Improving the Patient Experience* QIP annual submission also received a *Partially Met* validation status. Based on HSAG's validation feedback, SFHP corrected the deficiencies in its resubmission, resulting in the QIP achieving an overall *Met* validation status, with 100 percent of the evaluation elements receiving a met score (critical and noncritical).

Table 4.3 summarizes the aggregated validation results for SFHP's QIPs across CMS protocol activities during the review period.

Table 4.3—Quality Improvement Project Average Rates*
SFHP—San Francisco County
(Number = 4 QIP Submissions, 2 QIP Topics)
July 1, 2013, through June 30, 2014

QIP Study Stages	Activity	*Met* Elements	*Partially Met* Elements	*Not Met* Elements
Design	I: Appropriate Study Topic	100%	0%	0%
	II: Clearly Defined, Answerable Study Question(s)	100%	0%	0%
	III: Clearly Defined Study Indicator(s)	100%	0%	0%
	IV: Correctly Identified Study Population	100%	0%	0%
	V: Valid Sampling Techniques (if sampling is used)	100%	0%	0%
	VI: Accurate/Complete Data Collection	100%	0%	0%
Design Total		**100%**	**0%**	**0%**
Implementation	VII: Sufficient Data Analysis and Interpretation	94%	6%	0%
	VIII: Appropriate Improvement Strategies**	63%	38%	0%
Implementation Total		**85%**	**15%**	**0%**
Outcomes	IX: Real Improvement Achieved	Not Assessed	Not Assessed	Not Assessed
	X: Sustained Improvement Achieved	Not Assessed	Not Assessed	Not Assessed
Outcomes Total		**Not Assessed**	**Not Assessed**	**Not Assessed**

*The activity average rate represents the average percentage of applicable elements with a *Met, Partially Met,* or *Not Met* finding across all the evaluation elements for a particular activity.

**The stage and/or activity totals may not equal 100 percent due to rounding.

HSAG validated Activities I through VIII for both SFHP's *All-Cause Readmissions* and *Improving the Patient Experience* QIP annual submissions.

SFHP demonstrated a strong application of the Design stage, meeting 100 percent of the requirements for all applicable evaluation elements within the study stage for both QIPs.

Both QIPs progressed to the Implementation stage during the reporting period. The MCP demonstrated an adequate application of the Implementation stage, meeting 85 percent of the requirements for all applicable evaluation elements within the study stage for both QIPs. In the initial submission of the *All-Cause Readmissions* QIP, SFHP did not prioritize the identified barriers or provide an evaluation plan for each intervention, resulting in a lower score for Activity VIII. Upon resubmission, the MCP corrected the deficiencies, resulting in the QIP receiving an overall *Met* validation status. In the initial submission of the *Patient Experience* QIP, SFHP provided an

inaccurate interpretation of its findings, did not include MCP-specific data to support identified barriers and interventions, and did not document an evaluation plan for each intervention, resulting in lower scores for both Activities VII and VIII. In the resubmission, the MCP provided additional documentation, resulting in the scores for these elements improving and the QIP receiving an overall *Met* validation status.

Quality Improvement Project Outcomes and Interventions

The *All-Cause Readmissions* and *Improving the Patient Experience* QIPs did not progress to the Outcomes stage during the reporting period; therefore, no outcome information is included in this report. Following is a summary of the MCP's interventions for each QIP.

All-Cause Readmissions QIP

- Implemented a comprehensive pay-for-performance program that assigns points (and dollars) to medical groups and clinics to ensure that they are actively working with the MCP's members to decrease readmissions. The MCP contracted with the Center for Excellence in Primary Care to provide intensive training for clinic care managers. The measures are:
  - Each clinic or medical group will develop a personalized intervention that ensures that patients are contacted within seven days of discharge.
  - The contact may be in the form of an in-person visit or telephone call by the primary care provider or a care team member.
  - The contact may include the following:
    - Education about red flag symptoms.
    - Medication reconciliation.
    - Medication self-management.
    - Referral services.
    - Scheduling/reminder of post-discharge appointment.
  - Clinics and medical groups must report findings quarterly as a follow-up to the intervention.

Improving the Patient Experience QIP

- Access Program
  - Implement the Rapid Dramatic Performance Improvement Program, which will address infrastructure changes that clinics need to make in order to improve appointment availability and flow for increased patient access.
  - Launch a telephone access improvement initiative which will standardize and improve processes across differing clinic systems in order to establish a call center.

- Provider Communication Program
  - Held a three-day training session for providers on improving communication and patient-centeredness while effectively using an electronic health record during patient visits.
  - Implemented the Customer Service Action Series intervention to provide training on tactical protocols for responding to challenging patients, handling patient concerns proactively, and providing patient-centered personalized service.

Outcome information for each QIP will be included in SFHP's 2014–15 MCP-specific evaluation report.

Strengths

SFHP demonstrated a strong application of the QIP Design stage for both the *All-Cause Readmissions* and *Improving the Patient Experience* QIPs.

SFHP continues to show a commitment to its *Improving the Patient Experience* QIP despite the fact that DHCS does not administer the CAHPS survey annually, resulting in annual outcomes not being available.

Opportunities for Improvement

Although SFHP provided documentation that indicated the MCP will refer to the QIP Completion Instructions to ensure that all required documentation is included in the QIP Summary Form (See Appendix D), the MCP continues to have the opportunity to improve documentation in the QIP Summary Form, specifically related to the MCP's data analysis and interpretation of results. SFHP should continue to reference the QIP Completion Instructions to ensure that all documentation requirements for each activity have been addressed prior to the QIP submission and, if needed, request to have a technical assistance call with HSAG to ensure that the MCP fully understands all QIP documentation requirements.

Although the *Improving Patient Experience* QIP does not have annual results, SFHP should perform an annual barrier analysis and assess whether interventions should be revised, standardized, scaled up, or discontinued. Conducting an annual barrier analysis and assessing interventions should increase the likelihood of improving the patient experience.

Conducting the EQRO Review

Accurate and complete encounter data are critical to assessing quality, monitoring program integrity, and making financial decisions. Therefore, MCMC requires its contracted MCPs to submit high-quality encounter data. DHCS relies on the quality of these MCP encounter data submissions to accurately and effectively monitor and improve MCMC's quality of care, establish appropriate performance metrics, generate accurate and reliable reports, and obtain complete and accurate utilization information. The completeness and accuracy of these data are essential to the success of DHCS's overall management and oversight of MCMC.

Beginning in State Fiscal Year (SFY) 2012–13, DHCS contracted with HSAG to conduct an Encounter Data Validation (EDV) study. During the first contract year, the EDV study focused on an information systems review and a comparative analysis between the encounter data in the DHCS data warehouse and the data in the MCPs' data systems. For SFY 2013–14, the goal of the EDV study was to examine the completeness and accuracy of the encounter data submitted to DHCS by the MCPs through a review of the medical records.

Although the medical record review activities occurred during the review period for this report, their results and analyses were not available at the time this report was written. Individual MCP medical record review results and analyses will be included in each MCP's 2014–15 evaluation report.

Overall Findings Regarding Health Care Quality, Access, and Timeliness

HSAG developed a standardized scoring process to evaluate each MCP in the three domains of care—quality, access, and timeliness. A numerical score is calculated for each domain of care for performance measure rates, QIP validation, and QIP outcomes (measured by statistical significance and sustained improvement). A final numeric score, combining the performance measures scores and QIP performance scores, is then calculated for each domain of care and converted to a rating of above average, average, or below average. In addition to the performance score derived from performance measures and QIPs, HSAG uses results from the MCPs' medical audit/SPD medical survey reviews and assessment of the accuracy and completeness of encounter data to determine overall performance within each domain of care, as applicable. A more detailed description of HSAG's scoring process is included in Appendix C.

Please note that when a performance measure or QIP falls into more than one domain of care, HSAG includes the information related to the performance measure or QIP under all applicable domains of care.

Quality

The quality domain of care relates to the degree to which an MCP increases the likelihood of desired health outcomes of its enrollees through its structural and operational characteristics and through the provision of health services that are consistent with current professional knowledge in at least one of the six domains of quality as specified by the Institute of Medicine (IOM)—efficiency, effectiveness, equity, patient-centeredness, patient safety, and timeliness.[11]

DHCS uses the results of performance measures and QIPs to assess care delivered to beneficiaries by an MCP in areas such as preventive screenings and well-care visits, management of chronic disease, and appropriate treatment for acute conditions, all of which are likely to improve health outcomes. In addition, DHCS monitors aspects of an MCP's operational structure that support the delivery of quality care, such as the adoption of practice guidelines, a quality assessment and performance improvement program, and health information systems. DHCS also uses the results

[11] This definition of quality is included in Department of Health and Human Services, Centers for Medicare & Medicaid Services. *EQR Protocols Introduction: An Introduction to the External Quality Review (EQR) Protocols*, Version 1.0, September 2012. The definition is in the context of Medicaid/Children's Health Insurance Program MCOs, and was adapted from the IOM definition of quality. The CMS Protocols can be found at http://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Quality-of-Care/Quality-of-Care-External-Quality-Review.html.

of member satisfaction surveys to assess beneficiaries' satisfaction with the quality of the health care they receive from the MCPs.

HSAG reviewed SFHP's 2014 quality improvement program description and found detailed documentation of processes the MCP uses to ensure that quality care is provided to its MCMC members.

The rates for 14 quality performance measures were above the HPLs in 2014, and the following quality measures had rates above the HPLs for the fourth consecutive year:

- *Avoidance of Antibiotic Treatment in Adults With Acute Bronchitis*—Note: Although the rate for this measure declined significantly from 2013 to 2014, the rate remained above the HPL.
- *Childhood Immunization Status—Combination 3*
- *Comprehensive Diabetes Care—HbA1c Control (<8.0 Percent)*
- *Comprehensive Diabetes Care—LDL-C Control (<100 mg/dL)*
- *Comprehensive Diabetes Care—HbA1c Poor Control (>9.0 Percent)*
- *Weight Assessment and Counseling for Nutrition and Physical Activity for Children/Adolescents—Nutrition Counseling: Total*
- *Weight Assessment and Counseling for Nutrition and Physical Activity for Children/Adolescents—Physical Activity Counseling: Total*
- *Well-Child Visits in the Third, Fourth, Fifth, and Sixth Years of Life*

Two quality measures had rates above the HPLs for the third consecutive year:

- *Use of Imaging Studies for Low Back Pain*
- *Weight Assessment and Counseling for Nutrition and Physical Activity for Children/Adolescents—BMI Assessment: Total*

The rates for the following six quality measures improved significantly from 2013 to 2014:

- All three *Annual Monitoring for Patients on Persistent Medications* measures, resulting in the rates for the *ACE Inhibitors and ARBs* and *Diuretics* indicators moving from below the MPLs in 2013 to above the MPLs in 2014 and the *Digoxin* indicator moving from below the MPL in 2013 to above the HPL in 2014.
- Both *Medication Management for People with Asthma* measures, resulting in the rates moving from below the MPLs in 2013 to above the MPLs in 2014. Note: Since 2013 was the first year these measures were reported, DHCS did not hold the MCP accountable to meet the MPLs in 2013.
- *Prenatal and Postpartum Care—Timeliness of Prenatal Care*

Twelve of the measures stratified for the SPD population fall into the quality domain of care. No quality measures had SPD rates that were significantly better than the non-SPD rates, and the SPD rates for the following three quality measures were significantly worse than the non-SPD rates:

- *All-Cause Readmissions*
- *Comprehensive Diabetes Care—Blood Pressure Control (<140/90 mm Hg)*
- *Comprehensive Diabetes Care—Eye Exam (Retinal) Performed*

Both of SFHP's QIPs fell into the quality domain of care. Since neither QIP progressed to the Outcomes stage, HSAG was not able to assess the QIPs' success at improving the quality of care delivered to the MCP's MCMC members.

Overall, SFHP showed above-average performance related to the quality domain of care.

Access

The access domain of care relates to an MCP's standards, set forth by the State, to ensure the availability of and access to all covered services for MCMC beneficiaries. DHCS has contract requirements for MCPs to ensure access to and the availability of services to their MCMC members and uses monitoring processes, including audits, to assess an MCP's compliance with access standards. These standards include assessment of network adequacy and availability of services, coordination and continuity of care, and access to covered services. DHCS uses medical performance reviews, Medi-Cal Managed Care Division reviews, performance measures, QIP outcomes, and member satisfaction survey results to evaluate access to care. Measures such as well-care visits for children and adolescents, childhood immunizations, timeliness of prenatal care and postpartum care, cancer screening, and diabetes care fall under the domains of quality and access because beneficiaries rely on access to and the availability of these services to receive care according to generally accepted clinical guidelines.

HSAG reviewed SFHP's quality documents, which included descriptions of activities designed to ensure access to care for the MCP's MCMC members. Activities included monitoring adequacy of the MCP's provider network; participating in a prenatal care leadership group which is developing a plan to increase access to first trimester prenatal care for San Francisco's low-income residents; monitoring language access through medical group oversight audits, grievances, and provider network monitoring; and regularly monitoring the number of physicians in SFHP's specialty network that the MCP's members access most frequently.

The rates for the following access performance measures were above the HPL:

- *Childhood Immunization Status—Combination 3* for the fourth consecutive year
- *Comprehensive Diabetes Care—Medical Attention for Nephropathy* for the second consecutive year

- *Prenatal and Postpartum Care—Timeliness of Prenatal Care*
- *Well-Child Visits in the Third, Fourth, Fifth, and Sixth Years of Life* for the fourth consecutive year

The rates for the following access measures improved significantly from 2013 to 2014:

- *Children and Adolescents' Access to Primary Care Practitioners—25 Months to 6 Years*
- *Children and Adolescents' Access to Primary Care Practitioners—7 to 11 Years*
- *Prenatal and Postpartum Care—Timeliness of Prenatal Care*

Nine of the performance measures stratified for the SPD population fall into the access domain of care. No access measures had SPD rates that were significantly better than the non-SPD rates, and the SPD rates for the following access measures were significantly worse than the non-SPD rates:

- *All-Cause Readmissions*
- *Children and Adolescents' Access to Primary Care Practitioners—25 Months to 6 Years*
- *Children and Adolescents' Access to Primary Care Practitioners—7 to 11 Years*
- *Children and Adolescents' Access to Primary Care Practitioners—12 to 19 Years*
- *Comprehensive Diabetes Care—Eye Exam (Retinal) Performed*

Both of SFHP's QIPs fell into the access domain of care. Since neither QIP progressed to the Outcomes stage, HSAG was not able to assess the QIPs' success at improving access to care for the MCP's MCMC members.

Overall, SFHP showed above-average performance related to the access domain of care.

Timeliness

The timeliness domain of care relates to an MCP's ability to make timely utilization decisions based on the clinical urgency of the situation, to minimize any disruptions to care, and to provide a health care service quickly after a need is identified.

DHCS has contract requirements for MCPs to ensure timeliness of care and uses monitoring processes, including audits and reviews, to assess MCPs' compliance with these standards in areas such as enrollee rights and protections, grievance system, continuity and coordination of care, and utilization management. In addition, performance measures such as childhood immunizations, well-care visits, and prenatal and postpartum care fall under the timeliness domain of care because they relate to providing a health care service within a recommended period of time after a need is identified. Member satisfaction survey results also provide information about MCMC beneficiaries' assessment of the timeliness of care delivered by providers.

SFHP's quality improvement program description provides details of activities related to member rights and protections, grievances, continuity and coordination of care, and utilization management. Activities to ensure timeliness of care include training programs and monitoring timeliness of utilization management decisions, including expedited appeals.

The rates for three timeliness performance measures were above the HPLs in 2014:

- *Childhood Immunization Status—Combination 3* for the fourth consecutive year
- *Prenatal and Postpartum Care—Timeliness of Prenatal Care*—Note: the rate for this measure improved significantly from 2013 to 2014.
- *Well-Child Visits in the Third, Fourth, Fifth, and Sixth Years of Life*

Overall, SFHP showed above-average performance related to the timeliness domain of care.

Follow-Up on Prior Year Recommendations

DHCS provided each MCP an opportunity to outline actions taken to address recommendations made in the 2012–13 MCP-specific evaluation report. SFHP's self-reported responses are included in Appendix D.

Recommendations

Based on the overall assessment of SFHP in the areas of quality, timeliness, and accessibility of care, HSAG recommends the following to the MCP:

- Assess the factors leading to the SPD rates for six measures being significantly worse than the non-SPD rates to ensure that the needs of the SPD population are being met.
- Continue to reference the QIP Completion Instructions to ensure that all documentation requirements for each activity have been addressed prior to the QIP submission and, if needed, request to have a technical assistance call with HSAG to ensure that the MCP fully understands all QIP documentation requirements.
- Perform an annual barrier analysis for the *Improving Patient Experience* QIP, and assess whether interventions should be revised, standardized, scaled up, or discontinued.

In the next annual review, HSAG will evaluate SFHP's progress with these recommendations along with its continued successes.

Table A.1 provides two-year trending information for the SPD population across the measures each MCP is required to stratify for the SPD population. The following audit findings are provided within the table:

– = A year that data were not collected.

NA = A *Not Applicable* audit finding because the MCP's denominator was too small.

HSAG calculated statistical significance testing between the 2013 and 2014 rates for each measure using a Chi-square test and displayed this information within the "2013–14 Rate Difference" column. The following symbols are used to show statistically significant changes:

↑ = Rates in 2014 were significantly higher than they were in 2013.

↓ = Rates in 2014 were significantly lower than they were in 2013.

↔ = Rates in 2014 were not significantly different than they were in 2013.

Different symbols (▲▼) are used to indicate a performance change for *All-Cause Readmissions* and *Comprehensive Diabetes Care—HbA1c Poor Control* where a decrease in the rate indicates better performance. A downward triangle (▼) denotes a significant *decline* in performance, as denoted by a significant increase in the 2014 rate from the 2013 rate. An upward triangle (▲) denotes significant *improvement* in performance, as indicated by a significant *decrease* of the 2014 rate from the 2013 rate.

Not comparable = A 2013–14 rate difference could not be made because data were not available for both years, or there were significant methodology changes between years that did not allow for comparison.

Not Tested = No comparison was made because high and low rates do not necessarily indicate better or worse performance.

Table A.1—HEDIS 2014 SPD Trend Table
SFHP—San Francisco County

Measure	2013	2014	2013–14 Rate Difference
All-Cause Readmissions—Statewide Collaborative QIP Measure	18.08%	17.88%	↔
*Ambulatory Care—Emergency Department Visits per 1,000 Member Months**	74.89	75.73	Not Tested
*Ambulatory Care—Outpatient Visits per 1,000 Member Months**	527.95	615.01	Not Tested
Annual Monitoring for Patients on Persistent Medications—ACE Inhibitors or ARBs	77.85%	87.62%	↑
Annual Monitoring for Patients on Persistent Medications—Digoxin	80.56%	95.12%	↑
Annual Monitoring for Patients on Persistent Medications—Diuretics	79.97%	86.98%	↑
Children & Adolescents' Access to Primary Care Practitioners—12 to 24 Months	NA	NA	Not Comparable
Children & Adolescents' Access to Primary Care Practitioners—25 Months to 6 Years	83.67%	83.33%	↔
Children & Adolescents' Access to Primary Care Practitioners—7 to 11 Years	90.85%	89.41%	↔
Children & Adolescents' Access to Primary Care Practitioners—12 to 19 Years	87.06%	86.96%	↔
Comprehensive Diabetes Care—Blood Pressure Control (<140/90 mm Hg)	73.38%	69.91%	↔
Comprehensive Diabetes Care—Eye Exam (Retinal) Performed	63.43%	62.27%	↔
Comprehensive Diabetes Care—HbA1c Testing	90.51%	88.43%	↔
Comprehensive Diabetes Care—HbA1c Control (<8.0 Percent)	65.97%	65.05%	↔
Comprehensive Diabetes Care—LDL-C Control (<100 mg/dL)	50.69%	47.92%	↔
Comprehensive Diabetes Care—LDL-C Screening	81.48%	78.24%	↔
Comprehensive Diabetes Care—Medical Attention for Nephropathy	87.27%	85.42%	↔
Comprehensive Diabetes Care—HbA1c Poor Control (>9.0 Percent)	24.54%	23.84%	↔

*Member months are a member's "contribution" to the total yearly membership.

Table B.1 provides two-year trending information for the non-SPD population across the measures each MCP is required to stratify for the SPD population. The following audit findings are provided within the table:

– = A year that data were not collected.

NA = A *Not Applicable* audit finding because the MCP's denominator was too small.

HSAG calculated statistical significance testing between the 2013 and 2014 rates for each measure using a Chi-square test and displayed this information within the "2013–14 Rate Difference" column. The following symbols are used to show statistically significant changes:

↑ = Rates in 2014 were significantly higher than they were in 2013.

↓ = Rates in 2014 were significantly lower than they were in 2013.

↔ = Rates in 2014 were not significantly different than they were in 2013.

Different symbols (▲▼) are used to indicate a performance change for *All-Cause Readmissions* and *Comprehensive Diabetes Care—HbA1c Poor Control* where a decrease in the rate indicates better performance. A downward triangle (▼) denotes a significant *decline* in performance, as denoted by a significant increase in the 2014 rate from the 2013 rate. An upward triangle (▲) denotes significant *improvement* in performance, as indicated by a significant *decrease* of the 2014 rate from the 2013 rate.

Not comparable = A 2013–14 rate difference could not be made because data were not available for both years, or there were significant methodology changes between years that did not allow for comparison.

Not Tested = No comparison was made because high and low rates do not necessarily indicate better or worse performance.

Table B.1—HEDIS 2014 Non-SPD Trend Table
SFHP—San Francisco County

Measure	2013	2014	2013–14 Rate Difference
All-Cause Readmissions—Statewide Collaborative QIP Measure	7.59%	5.69%	↔
*Ambulatory Care—Emergency Department Visits per 1,000 Member Months**	24.57	23.26	Not Tested
*Ambulatory Care—Outpatient Visits per 1,000 Member Months**	300.16	330.07	Not Tested
Annual Monitoring for Patients on Persistent Medications—ACE Inhibitors or ARBs	73.62%	86.25%	↑
Annual Monitoring for Patients on Persistent Medications—Digoxin	NA	NA	Not Comparable
Annual Monitoring for Patients on Persistent Medications—Diuretics	74.36%	83.72%	↑
Children & Adolescents' Access to Primary Care Practitioners—12 to 24 Months	95.91%	97.04%	↔
Children & Adolescents' Access to Primary Care Practitioners—25 Months to 6 Years	89.65%	92.69%	↑
Children & Adolescents' Access to Primary Care Practitioners—7 to 11 Years	93.25%	94.85%	↑
Children & Adolescents' Access to Primary Care Practitioners—12 to 19 Years	91.27%	91.16%	↔
Comprehensive Diabetes Care—Blood Pressure Control (<140/90 mm Hg)	76.39%	76.80%	↔
Comprehensive Diabetes Care—Eye Exam (Retinal) Performed	69.68%	69.14%	↔
Comprehensive Diabetes Care—HbA1c Testing	90.97%	88.63%	↔
Comprehensive Diabetes Care—HbA1c Control (<8.0 Percent)	61.11%	66.13%	↔
Comprehensive Diabetes Care—LDL-C Control (<100 mg/dL)	48.61%	51.04%	↔
Comprehensive Diabetes Care—LDL-C Screening	81.25%	80.51%	↔
Comprehensive Diabetes Care—Medical Attention for Nephropathy	85.88%	85.38%	↔
Comprehensive Diabetes Care—HbA1c Poor Control (>9.0 Percent)	27.78%	22.27%	↔

*Member months are a member's "contribution" to the total yearly membership.

Quality, Access, and Timeliness Scoring Process

Scale
2.5–3.0 = Above Average
1.5–2.4 = Average
1.0–1.4 = Below Average

HSAG developed a standardized scoring process for the three CMS-specified domains of care—quality, access, and timeliness.[12] This process allows HSAG to evaluate each MCP's performance measure rates and QIP performance uniformly when providing an overall assessment of *Above Average*, *Average*, or *Below Average* in each of the domains of care.

The detailed scoring process is outlined below.

Performance Measure Rates

(Refer to Table 3.1)

Quality Domain

1. To be considered **Above Average**, the MCP must not have more than two measures below the MPLs. Also, the MCP must have at least three more measures above the HPLs than it has below the MPLs.
2. To be considered **Average**:

If there are **two or less** measures below the MPLs, the number of measures above the HPLs minus the number of measures below the MPLs must be less than three.

If there are **three or more** measures below the MPLs, the number of measures below the MPLs minus the number of measures above the HPLs must be less than three.

3. To be considered **Below Average**, the MCP will have three or more measures below the MPLs than it has above the HPLs.

[12] The CMS protocols specify that the EQRO must include an assessment of each MCP's strengths and weaknesses with respect to the quality, timeliness, and access to health care services furnished to Medicaid recipients in its detailed technical report. The report must also document procedures used by the EQRO to analyze the data collected and how the EQRO reached its conclusions regarding the quality, timeliness, and access to care furnished by each MCP. Additional information on this topic can be found at: http://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Quality-of-Care/Quality-of-Care-External-Quality-Review.html.

Access and Timeliness Domains

1. To be considered **Above Average**, the MCP must not have more than two measures below the MPLs. Also, the MCP must have at least two more measures above the HPLs than it has below the MPLs.
2. To be considered **Average**:

If there are **two or less** measures below the MPLs, the number of measures above the HPLs minus the number of measures below the MPLs must be less than two.

If there are **three or more** measures below the MPLs, then the number of measures below the MPLs minus the number of measures above the HPLs must be less than two.

3. To be considered **Below Average**, the MCP will have two or more measures below the MPLs than it has above the HPLs.

Quality Improvement Projects (QIPs)

Validation *(Table 4.2)*: For each QIP submission and subsequent resubmission(s), if applicable.

1. **Above Average** is not applicable.
2. **Average** = *Met* validation status.
3. **Below Average** = *Partially Met* or *Not Met* validation status.

Outcomes *(Table 4.4)*: Activity IX, Element 4—Real Improvement

1. **Above Average** = All study indicators demonstrated statistically significant improvement.
2. **Average** = Some, but not all, study indicators demonstrated statistically significant improvement.
3. **Below Average** = No study indicators demonstrated statistically significant improvement.

Sustained Improvement *(Table 4.4)*: Activity X—Achieved Sustained Improvement

1. **Above Average =** All study indicators achieved sustained improvement.
2. **Average =** Some, but not all, study indicators achieved sustained improvement.
3. **Below Average =** No study indicators achieved sustained improvement.

Calculating Final Quality, Access, and Timeliness Scores

For **Performance Measure** results, the number of measures above the HPLs and below the MPLs are entered for each applicable domain of care: Quality, Access, and Timeliness (Q, A, T); a score of 1, 2, or 3 is automatically assigned for each domain of care.

For each **QIP**, the Validation score (1 or 2), the Outcomes score (1, 2, or 3), and the Sustained Improvement score (1, 2, or 3) are entered for each applicable domain of care (Q, A, T). The scores are automatically calculated by adding the scores under each domain of care and dividing by the number of applicable elements.

The **overall Quality score is automatically calculated** using a weighted average of the HEDIS Quality and QIPs' Quality scores. The **overall Access score is automatically calculated** using a weighted average of the HEDIS Access and QIPs' Access scores. The **overall Timeliness score is automatically calculated** using a weighted average of the HEDIS Timeliness and QIPs' Timeliness scores.

Medical audit/SPD medical survey reviews do not have scores; therefore, they are not used in calculating the overall Q, A, and T scores. The qualitative evaluation of these activities is coupled with the objective scoring for performance measures and QIPs to provide an overall designation of above average, average, and below average for each domain. Additionally, the EDV study results are an indicator of an MCP's completeness and accuracy of data reporting to DHCS and are not a direct indicator of the quality, access, and timeliness of services provided to members; therefore, EDV study results are not included in the overall Q, A, and T scores.

APPENDIX D. MCP'S SELF-REPORTED FOLLOW-UP ON EXTERNAL QUALITY REVIEW RECOMMENDATIONS FROM THE JULY 1, 2012–JUNE 30, 2013 PERFORMANCE EVALUATION REPORT

for San Francisco Health Plan

The table below provides external quality review recommendations from the July 1, 2012, through June 30, 2013, Performance Evaluation Report, along with SFHP's self-reported actions taken through June 30, 2014, that address the recommendations. Neither HSAG nor any State agency has confirmed implementation of the actions reported by the MCP in the table.

Table D.1—SFHP's Self-Reported Follow-Up on External Quality Review Recommendations from the July 1, 2012–June 30, 2013 Performance Evaluation Report

2012–13 External Quality Review Recommendation Directed to SFHP	Actions Taken by SFHP During the Period July 1, 2013–June 30, 2014 that Address the External Quality Review Recommendation
1. Assess the factors that are leading to the rates for the three *Annual Monitoring for Patients on Persistent Medications* measures falling below the MPLs and identify interventions to be implemented that will result in an improvement in performance.	SFHP's rates have improved due to improved data collection, additional lab feeds, and incentivizing the three indicators in our Practice Improvement Program which provides incentives to providers, clinics, and medical groups for improved performance in the measure.
2. Assess the factors leading to the rate for the *Prenatal and Postpartum Care—Timeliness of Prenatal Care* measure declining significantly from 2012 to 2013 and identify improvement strategies to prevent further decline in the measure's rate.	SFHP recognizes that our rates significantly decreased from measurement year 2012 to 2013 in the prenatal indicator, and we believe this was due to a staff turnover in the HEDIS pursuit process and time constraints at the end of the HEDIS process. In result, SFHP prioritized the prenatal measure this year and provided additional training to the HEDIS pursuit team on pursuing prenatal records.
3. Assess the factors that are leading to a significantly higher rate of readmissions for the SPD population when compared to the non-SPD population and identify strategies to ensure that the MCP is meeting the needs of the SPD population.	SFHP has implemented a Trended Inpatient Utilization report which trends the *All-Cause Readmission* rate (30 days) for SPD and the non-SPD population. SFHP also has a pre-stratification algorithm which is used to analyze the Health Information Form (HIF) files and fee for service (FFS) utilization data. This initial risk scoring will help determine when the HRA will need to be completed to be compliant with regulatory time frames. The pre-stratification algorithm and the HRA help to identify members with higher risk and more complex health care needs. Those members are then referred to the delegated medical groups for case management. The delegated groups are required to provide quarterly reports to SFHP on members that have been identified with higher risk and are engaged in case management.

2012–13 External Quality Review Recommendation Directed to SFHP	Actions Taken by SFHP During the Period July 1, 2013–June 30, 2014 that Address the External Quality Review Recommendation
4. Refer to the QIP Completion Instructions prior to submitting QIPs to HSAG to ensure that all required documentation is included on the QIP Summary Form.	SFHP will refer to the QIP Completion Instructions and submission validation report comments prior to submitting QIPs to HSAG. In particular, SFHP will pay attention to Implementation stage requirements. Review of QIPs will be made to ensure that QIP submissions include the following: a comparison of the baseline rates to the goals, an interpretation of the baseline findings for study indicators, and the numerators and denominators for the baseline measurement.
5. Review the 2013 MCP-specific CAHPS®[13] results report and develop strategies to address the *Getting Care Quickly*, *Getting Needed Care*, and *Rating of Health Plan* priority areas.	In the last year, SFHP has focused on one of its highest priority improvement areas: Access to Care. We implemented two large initiatives to improve access to appointments in our network: • Rapid Dramatic Performance Improvement through Coleman Associates: In this intensive program, 3 to 5 consultants work side by side with clinic staff for one week, redesigning clinic processes to improve teamwork; patient access; and visit efficiency. This week is followed by two months of coaching, monitoring, and reporting of performance measures. In the last year, seven clinics in SFHP's primary care network participated in this program. • 10 Building Blocks Practice Coaching: Practice Coaches work long-term with multi-disciplinary improvement teams at primary care clinics to move clinics toward becoming Patient Centered Medical Homes. Access improvement is a primary focus of the improvement work. Currently, 16 clinics in SFHP's primary care network are engaged in this program.

[13] CAHPS® is a registered trademark of the Agency for Healthcare Research and Quality (AHRQ).