

DATE: February 26, 2024

QIP POLICY LETTER 24-004

TO: ALL DISTRICT MUNICIPAL PUBLIC HOSPITAL (DMPH) ENTITIES

SUBJECT: QIP POLICY INFORMATION RELEVANT TO THE DMPH MEASURE
COMMITMENT SURVEY AND THE DMPH COMMUNITY PARTNER
APPLICATION

SUPERSEDES: QIP POLICY LETTER (QPL) 21-003.

PURPOSE:

This QIP Policy Letter (QPL) informs DMPH QIP entities of QIP policies that are relevant for the accurate completion of the DMPH metric commitment survey. It also contains information and a link to the applicable Program Year (PY) application template for DMPHs seeking DHCS approval to use community partners for the QIP program.

BACKGROUND:

QIP policy information relevant to the DMPH measure commitment survey and community partner application is being released for the applicable PY to assess how these policies will impact commitment to a number of QIP measures and Community Partner(s). Additionally, DMPHs must refer to the corresponding QIP PY Reporting Manual, which includes the full QIP Program Policies and General Guidelines where requirements are stated prior to committing to the number of measures and Community Partner(s). All information contained herein is contingent upon the Centers for Medicare and Medicaid Services (CMS) approval of the corresponding QIP PY DMPH Preprint.

POLICY:

1. *DMPH Number of QIP Measures and Commitment Survey*

DHCS has developed two tiered groupings of DMPHs based on the sum of DMPH Net Medi-Cal Revenue from the most currently audited year. Each DMPH must complete a survey committing to a number of QIP measures within its tier

grouping that it will report on, 60 calendar days after the release of the corresponding PY Reporting Manual. Details on the deadline will be communicated to the DMPHs for the applicable PY, and the DMPHs should submit their measure commitment number to the QIP mailbox at QIP@dhcs.ca.gov. For DMPHs wanting to see their specific tier, please see Attachment 1, *Specific DMPH QIP Tiers*. Each tier contains a range of measures – a required minimum and a maximum possible that a DMPH could commit to report. DMPHs in Tier 2 with rural hospital designation, as defined by CA Health & Safety Code section 124840, have the option to move to Tier 1. QIP Tiers and measure ranges are in Table 1. **NOTE:** A DMPH **must** report on the number of measures it commits to in order to receive **ANY** payment for a PY. If a DMPH does not report on the number of measures it commits to via the survey, it will not receive **ANY** payment for the PY.

Table 1: DMPH QIP Tiers and Measure Ranges

DMPH QIP Tier	Measure Range		Sum of Net Medi-Cal Revenue
	Minimum	Maximum	
1	2	12	Less than \$30 million
2	10	20	\$30 million and above

When completing the measure commitment survey, DMPHs should consider that the number of measures they report partially determines their allocation, except as noted below. Each DMPH's specific allocation is determined by a minimum allocation amount of at least 0.75 percent of the total DMPH QIP pool or the following methodology, whichever is greater:

1. 60 percent by the number of measures the DMPH commits to report, proportionate to other DMPHs. Each DMPH will complete a survey by committing to the number of measures that it will report on for a PY by the deadline communicated to them at the time of the release of the measure commitment survey for the corresponding PY. DHCS will administer a new measure commitment survey during the first quarter of each PY (60 calendar days after the release of the corresponding PY Reporting Manual).
2. 40 percent by the sum of Medi-Cal revenue proportionate to other participating DMPHs.

If a DMPH is allocated the minimum, this will proportionally adjust all other DMPH allocations.

Before committing to a specific required number of measures, the DMPH must consider a multitude of factors including, but not limited to, which QIP Tier it is in, the QIP allocation methodology, the clinical services it offers, the participation of community partners (see Section 2 below), and the likelihood of its measure data to be above 30 patients for the baseline period. In addition, the DMPH should consider these additional QIP program requirements prior to committing to the number of measures for a PY:

- a. QIP Priority Measure sub-set and 50 Percent DMPH Requirement
 - 1) DHCS has designated 20 QIP measures as the Priority Measure sub-set. For DMPHs with primary care, at least **50 percent** of reported measures must be from the Priority Measure sub-set unless the DMPH does not offer the clinical service line covered by the measure or has a denominator of less than 30 for the PY. If a DMPH demonstrates to DHCS that either of the two criteria applies for a given Priority Measure, it must pick a different Priority Measure on which to report.
 - 2) If all Priority Measures have been exhausted due to either criterion, then the DMPH must demonstrate this within the QIP Reporting Application. At that point, the DMPH may select from the list of Elective Measures from the corresponding PY to meet its minimum measure commitment and it is no longer held to the 50 percent Priority Measure requirement.
- b. One Medi-Cal Managed Care (MCMC) Life for each QIP measure
 - 1) Each reported QIP measure [except Q-CDI: Reduction In Hospital Acquired Clostridium Difficile Infections and Q-SSI: Surgical Site Infection (SSI)] must include data with at least one person enrolled in MCMC in the denominator during the reporting PY in order for payment to be made. For sub-rated measures, at least one sub-rate must include data from at least one person enrolled in MCMC. An entity will earn an AV of zero and will not receive payment for a reported measure in which data does not include at least one MCMC life. However, the measure may still be used to fulfill the required number of measures for an entity's QIP reporting.
 - 2) NOTE: Any MCMC life meets this reporting requirement; the MCMC life does not necessarily have to be assigned to the DMPH unless it is required by the measure-specific criteria.
- c. QIP Target Populations

The QIP Target Population depends upon the specific QIP measure and can be identified in the applicable PY Reporting Manual.

2. ***DMPH Community Partner Applications***

The corresponding DMPH Preprint that is contingent upon CMS approval includes a provision allowing DMPHs to use community partner data in QIP data reporting, if approved to do so by DHCS. If approved, DMPHs must apply a consistent, identical method for including all eligible community partner patient data for each measure selected within their application(s). Measures may be selected from the list outlined in *QIP Measures Allowable for Community Partner Data* within the corresponding PY Reporting Manual. For each approved measure, the DMPH **must** include all patients from the community partner who meet measure denominator criteria **and** have had at least one encounter with the DMPH during the measurement period.

DMPHs seeking approval to use community partners in QIP will have the opportunity to apply for approval 60 calendar days after the release of the applicable PY Reporting Manual. Details will be communicated at time. Applications will be approved or denied no later than 45 calendar days upon receipt of application and on a case-by-case basis for DMPH-reported changes that affect the information within its application on which the approval is based, in accordance with criteria that the partnership must meet in order to be approved for this allowance. DHCS' approval will be valid for the corresponding PY.

DMPHs seeking to use community partner data must apply to DHCS using the corresponding application template available on [eQIP](#) and provide all supplemental documentation outlined in Attachment 2, DMPH Community Partner Application Materials. If a DMPH is seeking approval to use multiple community partners, one application per community partner is required. In addition, a minimum of one-year written agreement such as a Memorandum of Understanding (MOU) or Contract for the corresponding PY for each community partner is required.

DMPHs with Community Partners are required to re-report baseline data if they choose to continue reporting the same measure(s) in the current PY and the following scenario(s) apply:

- a. *Change in community partnership:*
In the prior PY, the DMPH had a community partnership with *Clinic A* and used *Clinic A's* data to report an approved community partner measure. In the current PY, the DMPH discontinued the partnership with *Clinic A* and established a new partnership with *Clinic B*. Therefore, *Clinic B's* data shall be used to report the same measure.
- b. *Change in data source:*
In the prior PY, the DMPH used both its own entity's data and its community partner's data to report an approved community partner

measure. However, the DMPH and its community partner discontinued their community partnership in the current PY. The DMPH chooses to only use its own entity's data to report the same measure in the current PY.

QIP entities should contact their QIP liaison or email the QIP Mailbox at QIP@dhcs.ca.gov if there are any questions concerning this QPL.

Sincerely,

ORIGINAL SIGNED BY JEFFREY NORRIS

Jeffrey Norris, MD

Value-Based Payment (VBP) Branch Chief
Quality and Population Health Management
California Department of Health Care Services

Attachment 1 – Specific DMPH QIP Tiers

Tier 1 (Metric Range 2-12)	Tier 2 (Metric Range 10-20)
Bear Valley Community Hospital, Big Bear Lake	Antelope Valley Hospital, Lancaster
Eastern Plumas Health Care, Portola	El Camino Hospital, Mountain View
Jerold Phelps Community Hospital, Garberville	El Centro Regional Medical Center, El Centro
John C. Fremont Healthcare District, Mariposa	Hazel Hawkins Memorial Hospital, Hollister★
Kern Valley Healthcare District, Lake Isabella	Kaweah Delta Health Care District, Visalia
Mammoth Hospital, Mammoth Lakes	Lompoc Valley Medical Center, Lompoc★
Mayers Memorial Hospital District, Fall River Mills	Marin General Hospital, Greenbrae
Modoc Medical Center, Alturas	Oak Valley Hospital District, Oakdale★
Northern Inyo Hospital, Bishop	Palomar Medical Center, Escondido
Palo Verde Hospital, Blythe	Pioneers Memorial Healthcare District, Brawley
Plumas District Hospital, Quincy	Salinas Valley Memorial Healthcare System, Salinas
San Bernardino Mountains Community Hospital, Lake Arrowhead	San Geronimo Memorial Hospital, Banning★
Seneca Healthcare District, Chester	Sierra View District Hospital, Porterville
Sonoma Valley Hospital, Sonoma	Tri-City Medical Center, Oceanside
Southern Inyo Hospital, Lone Pine	Washington Hospital Healthcare System, Fremont
Surprise Valley	★ DMPHs in Tier 2 with rural hospital designation, defined by CA Health & Safety Code section 124840, have the option to move to Tier 1.
Tahoe Forest Hospital District, Truckee	
Trinity Hospital, Weaverville	

Attachment 2 – DMPH Community Partner Application Materials

The application materials are located on [eQIP](#). The below table outlines the items that must be submitted as part of the DMPH Community Partner Application, which are due to the QIP liaison, 60 calendar days after the release of the QIP Reporting Manual.

	Description	Source Document
1	Completed Application	One per community partner
2	Written Contract Agreement ¹ that includes a Data Sharing/Data Use Agreement	One per community partner
3	Section 3 Responses Attachment that includes a Data Sharing Schedule	One per selected measure per community partner

¹ Written contract agreements submitted to DHCS in draft form (i.e., not yet finalized/executed) can only receive conditional approval, with final approval contingent upon the written agreement being finalized.