

MCO-QE Supplemental Data Exchange Workbook

June 2023

Background

The Statewide Health Information Network for New York (SHIN-NY) is the official Health Information Exchange for New York State. The SHIN-NY facilitates the secure electronic exchange of patient health information and connects healthcare professionals statewide through the Regional Health Information Organizations, called Qualified Entities (QEs).

The *Privacy and Security Policies and Procedures for Qualified Entities and their Participants* establish the specific policies that govern the QEs and their participants. Included in this are the circumstances in which QEs may disclose Protected Health Information (PHI) to payers without a patient's written consent. The policy states:

*"Disclosures to Payer Organizations for Quality Measures. Affirmative Consent shall not be required for a QE to Disclose Protected Health Information to a Payer Organization (including NYS DOH in regards to its operation of the New York State Medicaid program) or a Business Associate of a Payer Organization to the extent such Disclosure is necessary to (i) calculate performance of HEDIS or QARR measures; or (ii) in the case of disclosures to NYS DOH, determine payments to be made under the New York State Medicaid program."*¹

In July 2021, the National Committee for Quality Assurance (NCQA) began their Data Aggregator Validation (DAV) program. This program allowed for data streams to be validated as acceptable sources for Healthcare Effectiveness Data and Information Set (HEDIS) reporting. The DAV program dictates the output and file format through which standard supplemental data can be shared with a health plan.² As of June 2023, all SHIN-NY QEs have been validated through the NCQA Data Aggregator Validation (DAV) program through December 2023. As QEs began receiving DAV certification, it became important to ensure that QEs and Managed Care Organizations (MCOs) had established supplemental data connections.

The New York State Department of Health (NYSDOH) developed the MCO-QE Supplemental Data Exchange project (MCO-QE project) to gain a better understanding of the processes necessary for MCOs and SHIN-NY QEs to establish supplemental data connections. The MCO-QE project ran from June 2021 to July 2023 and followed six MCO-QE pairs as they planned and implemented connections and began exchanging supplemental data. Documenting the organizations' successful practices, challenges, and lessons learned provides NYSDOH with valuable insight into how to support MCOs and QEs seeking to establish data-exchanging connections for quality measurement purposes.

The MCO-QE Supplemental Data Exchange Workbook ("Workbook") contains materials and resources to guide MCOs and QEs in the planning and implementation of a supplemental data connection. This document provides a high-level overview of the key steps needed to exchange standard supplemental data between health plans and QEs. The tools are meant to be adaptable to each organization's needs and not prescriptive. Organizations can determine how to best integrate these materials into their processes to meet their specific needs.

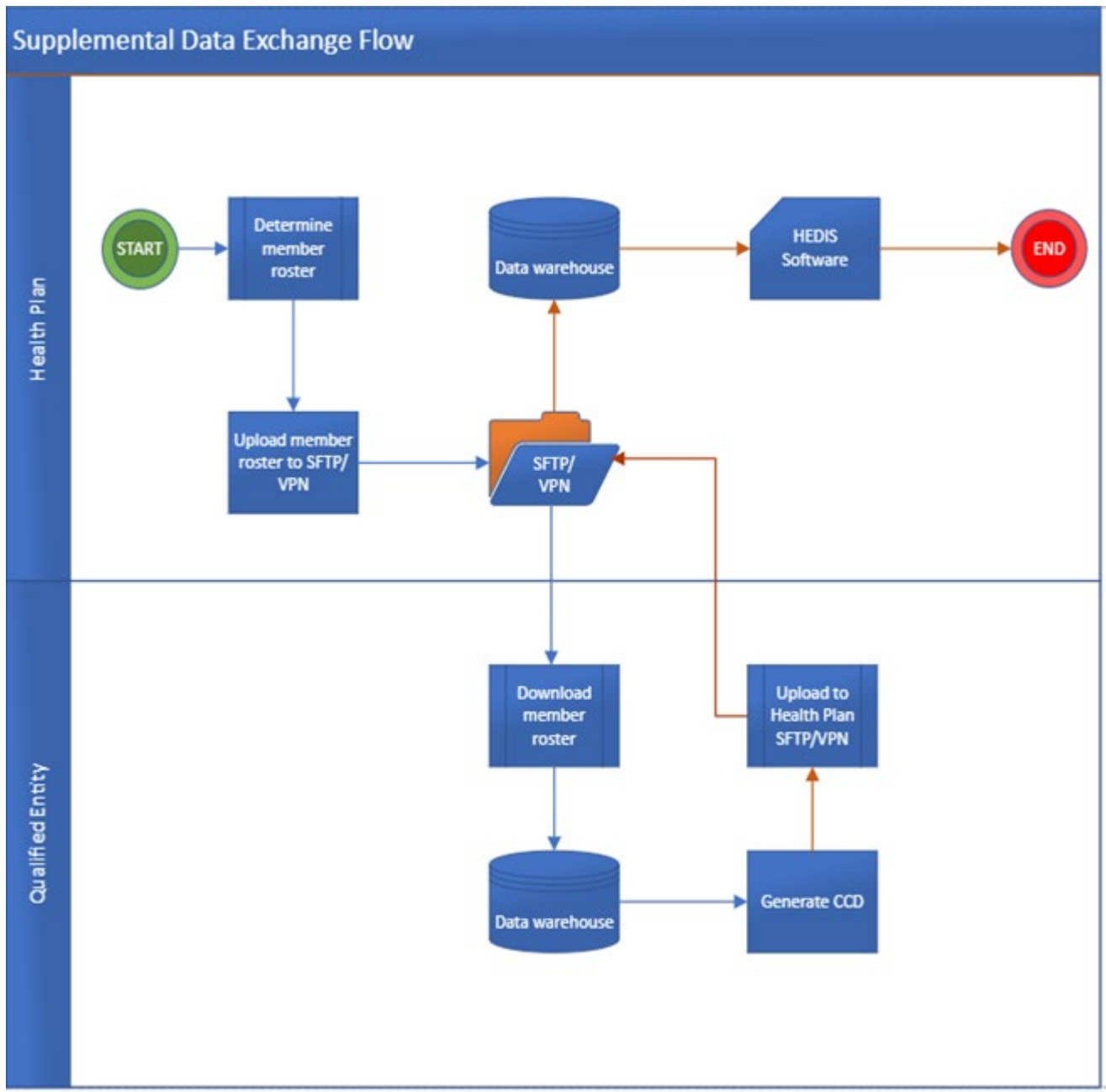
¹ https://www.health.ny.gov/technology/regulations/shin-ny/docs/privacy_and_security_policies.pdf

² <https://www.ncqa.org/programs/data-and-information-technology/hit-and-data-certification/hedis-compliance-audit-certification/data-aggregator-validation/>

Overview of Supplemental Data Exchange Process

The Supplemental Data Exchange Flow outlines the main steps that occur when a health plan³ and QE establish a supplemental data connection. This is a general overview of the process; steps may vary depending on individual organizations' processes and systems.

Supplemental Data Exchange Flow



³ The term “health plan” and “MCO” are used interchangeably.

Supplemental Data Exchange Flow Roles

Role	Responsibility
Health Plan	Report quality measures to the National Committee for Quality Assurance (NCQA) and the New York State Department of Health (NYSDOH).
Qualified Entity (QE)	Share supplemental data with health plans in a Continuity of Care Documents (CCDs) file format.
HEDIS Vendor/Software	Calculate HEDIS quality measures.

Supplemental Data Exchange Flow Description

The following chart details the high-level steps shown in the Supplemental Data Exchange Flow and provides additional information where applicable. Details related to the steps can be found in the suggested business requirements in the following section.

Process Step	Notes
Health Plan determines member roster	File format requirements (i.e., layout, data elements, members/LOB included) will be driven by the health plan, although QEs often provide input on the layout needed.
Health Plan uploads member roster	This step is completed using a secure transport mechanism – typically an SFTP.
QE accesses and downloads member roster	This step may not be included in every supplemental data exchange process flow as the member roster used for supplemental data may be the same roster used for other information (e.g., ADTs) that is already being exchanged between a health plan and a QE.
QE integrates member roster into data warehouse	
QE generates CCD	Depending on the member lookback period and the frequency of supplemental data file production, a QE’s internal systems may require discrete process steps for generating historical CCDs and incremental CCDs.
QE uploads CCD to Health Plan	This step is completed using a secure transport mechanism – likely an SFTP. The frequency of this process step – how often the QE sends the health plan supplemental data CCDs – is often dependent on member roster generation. In some instances, QEs may have certain products or service offerings that define this step.
Health Plan integrates CCD into data warehouse	
Health Plan integrates file into HEDIS software	The file format integrated by the health plan’s HEDIS software will vary depending on the HEDIS vendor’s ability to ingest a CCD vs. a flat file.

Suggested Business Requirements

Section 1: Secure Data Access

The goal of this phase is to establish the data-sharing agreements necessary for supplemental data exchange and ensure that the appropriate MCO and QE team members have access to secure sites to exchange information.

Business Agreements:

- **1.01:** The MCO and QE shall establish a Business Associate Agreement for the exchange supplemental data.
- **1.02:** The MCO and QE shall establish a Participation Agreement for the exchange supplemental data.
- **1.03:** The MCO and QE shall establish a Statement of Work for the exchange supplemental data.
- **1.04:** The MCO and QE shall complete the Security Assessment process for supplemental data exchange.
 - *Documents/processes required for supplemental data exchange typically include a Business Associate Agreement, Participation Agreement, Statement of Work, and Security Assessment. Executing these documents and completing the Security Assessment process could take a significant amount of time as this work often involves the legal counsel of both entities. The amount of time needed to complete these steps should be taken into consideration for the overall implementation timeline.*

Data Transfer:

- **1.05:** The MCO and QE shall determine a secure transport mechanism to exchange all files (e.g., SFTP, VPN).

Encryption:

- **1.06:** The MCO and QE shall determine the encryption at rest and in transit processes that must be in place for the exchange of member rosters.
 - *May not be included in every supplemental data exchange process flow as the member roster used for supplemental data may be the same roster used for other information (e.g., ADTs) that is already being exchanged between the MCO and QE.*
- **1.07:** The MCO and QE shall determine the encryption at rest and in transit processes that must be in place for the exchange of supplemental data files.

Data Access:

- **1.08:** The MCO and QE shall identify specific users and grant access to the secure transport mechanism to send/receive member rosters from the MCO to the QE.
 - *May not be included in every supplemental data exchange process flow as the member roster used for supplemental data may be the same roster used for other information (e.g., ADTs) that is already being exchanged between the MCO and QE.*
- **1.09:** The MCO and QE shall identify specific users and grant access to the secure transport mechanism to send/receive supplemental data files from the QE to the MCO.

Section 2: Development

The goal of this phase is to establish the requirements for sharing member rosters and supplemental data, including deciding on member roster file layout, lookback periods for historical data, frequency of sharing data, and file alert and change management processes.

Data Transfer:

- **2.01:** The MCO and QE shall setup the secure transport mechanism to exchange all files (e.g., SFTP, VPN) as defined in requirement 1.05.
- **2.02:** The MCO and QE shall determine the frequency of member roster and supplemental data exchange.
 - *The frequency of supplemental data file production (i.e., weekly, monthly, annually) is often dependent on the cadence at which the MCO sends the QE a member roster. For example, monthly supplemental data sent from the QE to the health plan may be dependent on the QE receiving a monthly member roster from the MCO. In some instances, QEs may have certain products or service offerings that affect this decision. Specifics of data exchange frequency and requirements may vary between MCO – QE pairs.*

File Layouts:

- **2.03:** The MCO shall determine the members and Lines of Businesses to be included in the rosters shared with the QE for supplemental data.
- **2.04:** The MCO and QE shall define the format for the member roster to be shared from the MCO to the QE.
- **2.05:** The MCO shall develop their member roster based on the QE's specifications and requirements.
 - *Developing member rosters is a joint effort between the MCO and QE. The file format should be readable by the QE. MCOs may choose to filter their full member roster based on specific needs (e.g., by Line of Business, member zip code, etc.). File format variables (e.g., layout, members included, specific data elements) will be driven by the MCO, although QEs often provide input on the layout needed.*
- **2.06:** The MCO and QE shall determine the acceptable file format for supplemental data exchange (or per NCQA's DAV CCD Implementation Guide, when applicable).
 - *The NCQA DAV program dictates the output and file format through which standard supplemental data can be shared with a health plan. NCQA's DAV CCD Implementation Guide specification is a constraint on HL7 C-CDA R2.1 and references key Continuity of Care Document (CCD) templates to generate a CCD document with information that supports quality measure reporting (e.g., HEDIS measures).⁴*
- **2.07:** The MCO and QE shall determine the lookback period for members' historical data.
 - *The amount of historical data provided on a member (lookback period) depends on MCO specifications and can vary between MCO – QE pairs. For example, an MCO may request a QE to provide up to ten (10) years of historical data to fulfil HEDIS measure requirements. Depending on*

⁴ [Data Aggregator Validation - NCQA](#)

the member lookback period and the frequency of supplemental data file production, a QE's internal systems may require additional steps for generating historical CCDs and incremental CCDs.

Monitoring/Alerts/Maintenance:

- **2.08:** The MCO and QE shall develop monitoring and alert requirements for the exchange of member rosters and supplemental data files.
 - *Monitoring and alert requirements vary between MCO-QE pairs. Organizations may utilize and/or adapt established internal procedures for file monitoring or develop new processes specific to supplemental data exchange.*
- **2.09:** The MCO and QE shall document maintenance and operations processes for the exchange of member rosters and the supplemental data files.

Section 3: Testing

The goal of this phase is for the MCO to receive the supplemental data files from the QE and prepare the data for integration into their HEDIS software. MCOs and QEs should test their processes and infrastructure to ensure that both environments are ready for supplemental data exchange.

Testing:

- **3.01:** The MCO and QE shall determine the general number of files needed for testing purposes.
- **3.02:** The MCO develop and send a test member roster to the QE.
 - *Health plans may opt to initially send a smaller member roster with a subset of patients to the QE in order to test the process of sending and receiving data. QEs may use members on the test roster to generate sample CCDs for the health plan.*
- **3.03:** The QE shall review the test member roster to ensure completeness and compatibility for supplemental data file generation.
- **3.04:** The QE shall produce a test supplemental data file and share it with the MCO.
- **3.05:** The MCO shall review the test files to ensure the appropriate infrastructure and architecture is in place to ingest the full supplemental data load.

Section 4: Production

The goal of this phase is for the MCOs to integrate the standard supplemental data received from NCQA DAV-QEs into their HEDIS software for use in HEDIS reporting.

Production:

- **4.01:** The MCO may integrate the supplemental data file into their HEDIS Software for measure calculation.
 - *Many MCOs use HEDIS vendors for quality measurement that are unable to ingest supplemental data files in a CCD format. As a result, the standard supplemental data in a CCD may need to be transformed into a format that is accepted and readable (e.g., flat file) by an MCO's HEDIS software. Language outlined in the NCQA DAV program manual describes the processes and documentation that must occur in order to support the transformation of a validated CCD into a flat file.*