



Neighborhood Health Plan of Rhode Island

2018 Quality Improvement Program Description

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I. Introduction

Neighborhood Health Plan of Rhode Island's (Neighborhood) Quality Improvement (QI) Program strives to ensure that members have access to high quality health care services that are responsive to their needs and result in positive health outcomes. In order to meet this high level goal, Neighborhood's QI Program targets clinical quality of care, member and provider satisfaction and internal operations. The purpose of the Quality Improvement Program Description is to detail the scope, goals, and objectives of the program; to demonstrate how improvement activities are operationalized within Neighborhood; to describe the methodology used within the program; to outline the structure and functions of the committees and subcommittees that support the program; and to delineate the oversight and guidance provided to the program by Neighborhood's senior management and the Neighborhood Board of Directors. Annually, the Quality Improvement Program Description is approved by the Neighborhood Board of Directors.

II. Scope and Philosophy of the Quality Improvement Program

Neighborhood's QI Program covers all its product lines. Within the scope of its QI Program, Neighborhood monitors and evaluates care and services rendered to members, with particular emphasis on access to care, availability of services, member satisfaction, and health outcomes, as captured through routine health plan reporting, annual HEDIS[®] and CAHPS[®] results, assessment of provider and member satisfaction, accessibility and availability standards, utilization trends, and especially designed quality improvement studies. Neighborhood assesses its performance, including the performance of its contractors and its network providers, against goals and objectives that are evidence-based and align with industry standards.

Neighborhood's QI Program extends to all departments within the organization, at all levels, in the recognition that teamwork and collaboration are essential for quality improvement. Department directors are charged to develop and oversee quality improvement activities aimed at clinical care, services, and organizational efficiency within their own departments as well as coordinate and participate in interdepartmental quality improvement activities, as applicable.

As one component of its QI Program, Neighborhood annually develops a QI Work Plan to guide the organization's improvement initiatives for the upcoming calendar year. The QI Work Plan lists each planned initiative or ongoing activity with a brief description, the timeframe for completion, the status of the activity and the individual responsible to oversee and facilitate the activity. The Work Plan includes QI activities relevant to the work of Neighborhood's subcontractors as well as those undertaken directly by the Plan.

To assess the effectiveness of the QI Program, Neighborhood produces an annual evaluation which depicts the Plan's measurable performance achievements over the course of the year, with trended data when available. The Quality Improvement Annual Evaluation includes identification of the barriers which made quality improvement difficult to achieve, the interventions recommended to overcome these barriers, and a summary of the overall effectiveness of the program, with consideration given to the adequacy of resources, committee structure, and leadership involvement.

Neighborhood delegates the quality improvement function for behavioral health services to a National Committee for Quality Assurance (NCQA)-accredited Managed Behavioral Healthcare Organization. Neighborhood provides oversight of the delegated QI activities as described in Section XI of this document.

III. Methodology

Neighborhood's Continuous Quality Improvement (CQI) approach emphasizes the use of "Plan Do Study Act" (also known as the Shewhart or Deming Cycle) as the methodology of choice to achieve and maintain performance excellence. Neighborhood achieves this CQI mission by:

- Creating an organizational culture of continuous quality improvement
- Using data and measurable outcomes to identify opportunities for improvement and to monitor progress toward established goals
- Consistently applying proven QI methods and tools to all quality improvement activities in the areas of clinical practice, service delivery, and internal operations
- Achieving recognition among industry peers as an inspiring model of CQI, and
- Delivering ever improving value to internal and external customers and stakeholders contributing to organizational sustainability.

Neighborhood's CQI initiatives are multi-disciplinary and extend across to all departments within the organization, at all levels, in recognition that teamwork and collaboration are essential for continuous quality improvement. CQI extends beyond the regulatory and contractual requirements and accrediting standards to all aspects of our daily work. Neighborhood's CQI efforts support the Plan's mission, vision and values and reflect the following core principles:

- *Leadership Driven* – Management Team involvement is key to the success of CQI. Neighborhood's Management Team leads the creation of an organizational culture that supports CQI, model leadership practices that promote and sustain improvement efforts, and create an open and encouraging environment where all staff can use performance improvement to develop their potential for doing the best job they can.
- *Customer Focused* – CQI understands and respects the needs and requirements of internal and external customers, and always strives to exceed their expectations.
- *Employee Empowerment/Involvement* – CQI involves staff at all levels of the organization and takes concrete steps to enable them to make improvement decisions that affect their daily work. CQI supports staff by providing the resources, training and structure necessary to achieve improvement.
- *Results-Based Decision-Making* – CQI identifies opportunities and improves programs and services by using reliable data for decision-making and focusing on measurable outcomes.

The Plan Do Study Act (PDSA) quality improvement methodology is a systematic, data-driven approach that must be employed across all departments to ensure continuous quality improvement in the Plan's clinical and service performance and operational functions and efficiencies.

The following are the steps applied to all quality improvement initiatives undertaken by Neighborhood:

Plan

Neighborhood monitors a variety of performance measures covering clinical care and service delivery to identify opportunities for improvement. Neighborhood uses HEDIS and CAHPS results, program evaluation results, member and provider satisfaction surveys, the Member Services member call logs, claims, utilization data, disease and case management data, medical records and electronic

medical records, patient safety data, accessibility and availability surveys, member and provider focus groups, and other sources of data to guide and inform the quality improvement process. The available data are analyzed to assess performance over time, across providers, and among member sub-groups. Root cause analysis is conducted, often in collaboration with network providers and / or member representatives, to better understand trends in the data and identify opportunities for improvement.

Neighborhood's standing QI committee, subcommittees, and ad-hoc QI workgroups are responsible for identifying quality improvement interventions to address the identified opportunities for improvement and prioritizing the work and initiatives to be performed. Priorities are set, and interventions are designed based on the data analysis as well as evidence-based practice, when possible. Operational efficiency and the appropriate and reasonable use of the resources within the organization are considered when prioritizing each activity/intervention. QI workgroups lead individual improvement activities through the PDSA cycle.

For each improvement activity selected, Neighborhood's QI workgroups identify goals and objectives that are specific, measurable, achievable, relevant, and time-bound (SMART). The performance goals and objectives selected often align with local and national benchmark data, including but not limited to Quality Compass[®] and NCQA Accreditation benchmarks for Medicaid Managed Care organizations.

Do

The QI team leaders, in collaboration with their improvement work groups, carry out the interventions designed based on the analysis of data and evidence-based practice, whenever possible.

Study

The improvement work group monitors the effectiveness of the interventions carried out based on the goals and measures previously identified. The data is collected and analyzed, and the results are reported to the appropriate QI team based on the targets established for each activity using the PDSA methodology, including the identification of barriers and the interventions for overcoming the identified barriers.

Act

The QI team leaders in collaboration with their improvement work groups modify the interventions, as necessary, and identify the next steps. Successful interventions are monitored for sustainability and transferability. To ensure that quality improvement is continuous and the identified goals and/or objectives are being met, each quality improvement activity is reviewed and discussed by the designated committee or subcommittee regularly. Modifications to the initiatives are implemented as necessary and incorporated into the QI Work Plan.

Data Validation Process

Neighborhood monitors and evaluates the care and services provided to its members through collection and analysis of several data sources, including, but not limited to, HEDIS and CAHPS results, provider satisfaction survey results, accessibility and availability standards, and utilization trends. HEDIS and CAHPS data are collected using NCQA-certified third party vendors and validated by an NCQA-approved auditor contracted by Neighborhood. Surveys performed by external vendors are validated by the vendor according to contract requirements. Data produced internally are validated by business leads and presented at the Medicaid & Commercial and INTEGRITY & UNITY Quality and Operations Committees.

IV. Program Goals and Objectives

The overall goal of Neighborhood's QI Program is to ensure that members have access to high quality health care services that are responsive to their needs and result in positive health outcomes.

The objectives of the QI Program in support of this goal are to:

- Assure access to high quality medical and behavioral healthcare
- Support members with acute and long-term health care needs
- Monitor and improve coordination of care across settings
- Improve member and provider experience
- Ensure the safety of members in all health care settings
- Monitor quality of care in nursing facilities through MDS data and other data sources
- Engage members in their own care
- Improve HEDIS and CAHPS performance
- Improve Health Outcome Survey performance
- Achieve maximum performance under the RI Medicaid Performance Goal Program and other pay for performance initiatives as appropriate
- Achieve optimum performance for Quality Withhold under the INTEGRITY product line
- Maintain grievance and appeal procedures and mechanisms and assure that members can achieve resolution to problems or perceived problems relating to access and other quality issues
- Maintain collaborative relationships with network providers and state agencies
- Improve operational efficiency in the work performed across the organization
- Ensure Neighborhood's quality improvement structure and processes adhere to NCQA standards and state and federal requirements
- Assess the QI Program annually and make changes as necessary to improve program effectiveness

V. Program Structure, Leadership and Support Committees [QI 1A.1](#)

A. Board of Directors

Neighborhood's Board of Directors has final authority and responsibility for the care and service delivered to Neighborhood's members. The Board of Directors delegates oversight of the Quality Improvement Program to the Clinical Affairs Committee. The Board exercises its oversight of the Program by annually approving the Quality Improvement Program Description and Quality Improvement Work Plan, and by annual review of the Quality Improvement Program Evaluation.

B. Clinical Affairs Committee [QI 1A.6](#)

The Clinical Affairs Committee (CAC) is Neighborhood's Quality Improvement Committee. The CAC provides direction to the Quality Improvement Program and Neighborhood staff for all activities described in the Quality Improvement Program Description, Annual Evaluation and Work Plan, including those quality improvement activities that have been delegated to the health plan's behavioral health vendor and other subcontracts. The CAC recommends approval of Neighborhood's Quality Improvement Program Description and Work Plan to the Board of Directors after review and recommendations. The CAC annually reviews the QI Program Evaluation. The CAC oversees the credentialing and recredentialing processes for providers and facilities and approves or denies their application to be part of Neighborhood's network. The CAC also reviews and makes network determinations, regarding care provided to Neighborhood members, for behavioral health providers presented by Beacon Health Option's Credentialing Committee. The CAC is responsible for quality assurance and peer review to address substantiated

complaints and concerns about practitioners who fail to adhere to established standards of care. The CAC meets monthly, reports to the Board of Directors and is chaired by a network practitioner who is appointed by the Board. The activities of the CAC include but are not limited to the following:

- Reviews and approves the organization's clinical practice and preventive care guidelines.
- Reviews practitioner performance monitoring reports and clinical quality of care issues identified and tracked by the Quality Assurance Committee and Credentialing.
- Reviews and recommends approval of the Quality Improvement Program Description and Quality Improvement Work Plan to the Board of Directors.
- Reviews the Quality Improvement Annual Evaluation.
- Reviews and recommends approval of the quality improvement documents of delegated entities to the Board of Directors.
- Provides input and high-level direction for all activities described in the Quality Improvement Program Description and Quality Improvement Work Plan, including those QI activities that have been delegated.
- Identifies and recommends quality improvement activities and programs for Neighborhood on an ongoing basis as well as within the context of the annual work plan.
- Promotes practitioner and staff participation in the QI Program through planning, design, implementation and/or review.
- Provides insight and recommendations to the Pharmacy and Therapeutics, Medicaid & Commercial Quality and Operations, INTEGRITY & UNITY Quality and Operations, and Clinical Management Committees for QI activities.
- Maintains written minutes which are approved by the Committee and signed by the Committee Chair.

The Chair or President of the Board of Directors appoints the Chair of CAC, and the Nominating Committee appoints its members for voluntary terms. Committee membership includes primary care and specialty care practitioners from the hospital-based practices, private practices, and community health centers in Neighborhood's network. Specialty care practitioners represented include geriatricians, behavioral health providers, and providers with expertise in Long Term Services and Supports (LTSS). Key staff, including the Chief Medical Officer, Medical Director, Director of Evaluation and Improvement, representatives from Neighborhood's behavioral health vendor, and additional Neighborhood staff provide support to CAC and present reports and status updates as necessary.

C. Chief Medical Officer QI 1A.4

The Chief Medical Officer (CMO) is a Rhode Island-licensed, board-certified physician. The Chief Medical Officer guides the direction, delivery, and implementation of Neighborhood's QI Program and oversees the functions, responsibilities, planning, design and implementation of activities undertaken by the QI committees and subcommittees. The CMO provides guidance to the CAC, the Medicaid & Commercial Quality and Operations Committee, the Pharmacy & Therapeutics Committee, the Clinical Management Committee and the INTEGRITY & UNITY Quality and Operations Committee. Additionally, the CMO provides guidance to the internal peer review committee, the Quality Assurance Committee (QAC), and delegates the day-to-day responsibilities to the Medical Director. The CMO or his/her designee is a non-voting member of the CAC and a standing member of other quality improvement committees.

The Chief Medical Officer has responsibility for the oversight, direction, delivery, and implementation of Neighborhood's Quality Improvement Program. The day-to-day operations of Neighborhood's Quality Improvement Program are performed by the Medicaid & Commercial

Quality Operations Committee and the INTEGRITY & UNITY Quality and Operations Committee, including the development of Neighborhood's Quality Improvement Program Description, Annual Evaluation and Work Plan.

The CMO is responsible for the delivery of medical and behavioral healthcare services through operational oversight of the Pharmacy, Medical Management, Network Performance and Regulation and Evaluation and Improvement Departments.

D. Medical Director and Associate Medical Directors

The Medical Director and Associate Medical Directors (MD/AMDs) are Rhode Island-licensed physicians. The AMDs support the MD in assisting the CMO in the role of providing clinical guidance to the organization by directing the development of new clinical programs, evaluating new medical technologies, developing criteria for standards of performance to evaluate individual provider compliance with clinical practice and preventive health guidelines, and providing oversight to physician reviewer and consultant activities and recruitment. The MD/AMDs communicate with practitioners regarding features of the Utilization Management, Clinical Programs and Case Management Programs and on individual cases as necessary. The Medical Director or his/her designee chairs the Pharmacy and Therapeutics Committee, the Clinical Management Committee and the Quality Assurance Committee. The Medical Director or his/her designee oversees the credentialing and recredentialing processes, manages the quality assurance incident reporting process, facilitates practitioner peer review and disciplinary action, and provides staff support to the Clinical Affairs Committee and is a member of the Medicaid & Commercial Quality and Operations Committee and INTEGRITY & UNITY Quality and Operations Committee. The Medical Director and Associate Medical Directors also serve on HEDIS Improvement Work Groups, as needed.

Support Committees and Staff:

The quality improvement support committees are the Medicaid & Commercial Quality and Operations Committee, the INTEGRITY & UNITY Quality and Operations Committee, the Clinical Management Committee and the Pharmacy and Therapeutics Committee. Each of these committees performs quality improvement activities within their areas of focus and is accountable to the Chief Medical Officer who provides the day-to-day direction to the QI Program. An organizational chart showing reporting relationships for these committees appears as Appendix A.

E. Medicaid & Commercial Quality and Operations Committee

The Medicaid & Commercial Quality and Operations Committee (M&CQOC) provides direction, guidance, and input to the quality improvement activities undertaken and implemented within the organization to monitor and improve the efficiency and operations of Neighborhood's departments and service to members and providers, with primary focus on quality in the Medicaid and Commercial products. M&CQOC advises the CMO on the quality of clinical care, operational performance and member and provider services provided by Neighborhood. The CMO provides oversight and direction to M&CQOC and the INTEGRITY & UNITY Quality and Operations Committees and is responsible for ensuring that the QI Work Plan and Annual Evaluation presented to the Clinical Affairs Committee address all clinical, service and performance improvement activities undertaken by Neighborhood. Beacon and other subcontractors if applicable also report regularly to the M&CQOC on specific QI activities undertaken in their respective areas.

The Medicaid & Commercial Quality and Operations Committee:

- Oversees the development of the Quality Improvement Program Description, Work Plan and Evaluation and submits them for review and approval to the Clinical Affairs Committee
- Ensures that Neighborhood's quality improvement philosophy extends to each department's day-to-day operations
- Identifies and recommends quality improvement opportunities, activities and programs for Neighborhood's clinical performance on an ongoing basis as well as within the context of the annual work plan
- Ensures practitioner and staff participation in the Quality Improvement Program through planning, design, implementation and/or review
- Identifies opportunities to improve departmental and interdepartmental business processes and operational functions
- Serves as a resource for departmental improvement projects
- Addresses opportunities for improvement in the areas of member and provider satisfaction, accessibility of services, and program effectiveness
- Develops and monitors performance and implementation of the HEDIS and CAHPS Improvement Plans
- Establishes and participates in workgroups and subgroups as necessary to address identified opportunities for improvement
- Identifies and monitors departmental metrics
- Maintains written minutes which are approved by the Committee and signed by the Committee Chair.

The Medicaid & Commercial Quality and Operations Committee is a multidisciplinary Committee, which meets monthly, is chaired by the Director of Evaluation and Improvement, and reports on its activities to the Clinical Affairs Committee on a quarterly basis.

F. INTEGRITY & UNITY Quality and Operations Committee

The INTEGRITY & UNITY Quality and Operations Committee monitors and reviews the quality improvement and operational activities of the RHO UNITY and INTEGRITY MMP products. Findings and issues are presented to the Clinical Affairs Committee for review and approval and also shared with the Chief Medical Officer and the Vice President for Medicare and Medicaid Integration. The CMO and the Vice President of Medicare and Medicaid Integration provide the oversight and direction to the INTEGRITY & UNITY Quality and Operations Committee.

The INTEGRITY & UNITY Quality and Operations Committee meets monthly to coordinate reporting activities, review selected measures of program effectiveness and identify areas in need of improvement through review of regular reports and facilitating improvements. On a monthly basis, the INTEGRITY & UNITY Quality and Operations Committee reviews trends for UNITY and INTEGRITY members to determine if there is over or under-utilization based on members' demographics, diagnosis and conditions, including review of LTSS operations.

The INTEGRITY & UNITY Quality and Operations Committee is responsible for establishing workgroups charged with improving performance when measure results are below target. When specific metrics do not meet the established goals and benchmarks, the INTEGRITY & UNITY Quality and Operations Committee reviews the data with the appropriate business owners and identifies barriers to meeting the goals and possible interventions to overcome the barriers.

Feedback and recommendations from the UNITY and INTEGRITY Member Advisory Workgroups are shared with the INTEGRITY & UNITY Quality and Operations Committee.

The Director of Evaluation and Improvement and the RHO Product Manager co-chair the INTEGRITY & UNITY Quality and Operations Committee. The INTEGRITY & UNITY Quality and Operations Committee is comprised of VP of Medicare and Medicaid Integration, Medical Director, Compliance Officer, Director of Claims, Director of Operations-Member Support Services, Director of Pharmacy Programs, Director of Utilization Management, Manager of Care Management, Manager of Claims Production, Manager of Grievance and Appeals Unit, Manager of Performance Improvement and Accreditation, Manager of Member Services, LTSS Oversight Manager, Member Experience Advisor, MMP Member Advocate, Behavioral Health Project Specialist, Provider Services Specialist, Quality Outcomes Specialist or their representative.

G. Clinical Management Committee

Neighborhood's Clinical Management Committee (CMC) provides direction for clinical services such as new and changing medical and behavioral health technology, clinical medical policies, utilization management procedures, and the assurance of consistent medical review criteria and actions.

The CMC acts in an advisory capacity to the Chief Medical Officer. The CMC:

- Evaluates the development of new medical technology of pertinence to Neighborhood's members, including technology decisions made by Neighborhood's behavioral health vendor.
- Recommends the development of new or the modification of established Clinical Medical Policies, which are reviewed annually. These policies are used for medical necessity decisions.
- Assesses and evaluates reports of under- and over-utilization and reviews Neighborhood's and its delegates' clinical appeals and denials data.
- Reviews and approves Neighborhood's Utilization Management Program Description and Annual Evaluation, including the delegated entities (eviCore and Beacon Health Strategies).
- Monitors and improves members' and providers' satisfaction with Neighborhood's utilization management processes and decision-making.
- Maintains written minutes which are approved by the Committee and signed by the Committee Chair.

The Committee meets bi-monthly, is chaired by the Medical Director or his/her designee and submits detailed minutes of its meetings to the Clinical Affairs Committee. Ad-hoc meetings may be convened for the expedited assessment of new medical technology or new uses of medical technology as necessary, i.e. on a case-by-case basis. Committee members include: primary care and specialty care practitioners, the Medical Director and/or the designated Associate Medical Director, Director of Utilization Management and Clinical Medical Policy and Medical Review Nurse. External physician reviewers are consulted and/or invited to participate in meetings to provide their expertise on specific new technologies, as needed. Representatives from Neighborhood's behavioral health vendor and additional Neighborhood staff provide support to CMC and present reports and status updates as necessary.

The Neighborhood CMC Chair receives the meeting minutes and related documentation of technology review activities conducted by Neighborhood's behavioral health vendor.

H. Pharmacy and Therapeutics Committee

The Pharmacy and Therapeutics Committee (P&T) acts in an advisory capacity to the Chief Medical Officer on the provision of quality pharmaceutical services. The P&T Committee is responsible to

regularly review and revise the Neighborhood Formulary. The P&T reviews the pharmacy programs for the Medicaid and Exchange product lines. The Committee meets quarterly to assess the safety, efficacy, and effectiveness of new medications or therapeutic classes and in this review considers FDA classification, information from peer-reviewed medical literature, and research monographs prepared by expert consultants in clinical pharmacology. As part of the evaluation process associated with each new drug or drug class, the P&T Committee reviews utilization data to identify trends in drug use. This information is used to help develop and implement specific initiatives to promote appropriate use of drug therapies. The P&T Committee is responsible to:

- Establish a pharmacy program and formulary that ensures cost-effective drug therapy.
- Review and revise the formulary.
- Develop pharmacy practice guidelines and performance standards.
- Review and approve all quality improvement activities relative to drug utilization activity.
- Assess new pharmaceutical technology and summarize activities / recommendations for distribution to the Clinical Management Committee and Clinical Affairs Committee.
- Provide feedback, summary reports, and notification of formulary changes to network clinicians.
- Maintain written minutes which are approved by the Committee and signed by the Committee Chair.

The Medical Director or his/her designee chairs the Committee. Committee members include external members with representatives from community health centers, behavioral health and primary care and internal clinicians.

PerformRx's Pharmacy and Therapeutics Committee, the Plan's pharmacy and benefit manager, reviews the pharmacy program for INTEGRITY MMP including the Part D formulary. The P&T has oversight responsibility for the Part D Formulary.

I. Quality Assurance Committee

The Quality Assurance Committee (QAC) is responsible for investigating member complaints about their clinical quality of care as well as concerns that are forwarded by Neighborhood staff from their contact with members. QAC is responsible for making the determination as to whether the issue is standard of care, is an opportunity for improvement, or is a quality of care concern. QAC notifies the provider of the determination and, when warranted, requests a correction plan be submitted and implemented by the provider. Cases determined to be a "Quality of Care Concern(s)," with or without a corrective action plan, are presented to the Clinical Affairs Committee for any additional recommendations that they might have or for inclusion in their re-credentialing decisions.

QAC meets monthly or more frequently as needed, reports to the Clinical Affairs Committee and is chaired by the Medical Director. Members of QAC include the Quality Assurance Specialist, an RN who coordinates the QAC activities, the Medical Director, the Associate Medical Directors and the Medical Consultants.

J. Management Team / Staff

In addition to the quality improvement and supporting committees above, the Management Team is critical to the success of the CQI process by leading the creation of an organizational culture that supports CQI. In particular, the Chief Medical Officer or his/her designee is a standing member of the Medicaid & Commercial Quality and Operations and the INTEGRITY & UNITY Quality and Operations Committees.

Each department Director is expected to participate and work collaboratively on the quality improvement activities that are undertaken organization-wide and at the departmental level to improve the clinical care and service delivered and improve operations effectiveness and efficiency.

All staff members are given the responsibility and authority to participate in Neighborhood's quality improvement efforts. Success of CQI is dependent on staff members as they drive the day-to-day work for the organization and they are the individuals who carry out the tasks and are closest to the potential opportunities for continuous quality improvement.

K. Department of Evaluation and Improvement

Reporting to the Chief Medical Officer, the Director of Evaluation and Improvement is accountable for the Plan's performance in the areas of clinical quality and member satisfaction. The Department of Evaluation and Improvement (DEI) oversees the implementation and the effectiveness of the QI Program by:

- Coordinating the preparation of the Quality Improvement Program Description, Work Plan and Annual Evaluation.
- Facilitating the monitoring of the quality improvement work plan through reporting to Medicaid & Commercial Quality and Operations and the INTEGRITY & UNITY Quality and Operations Committees.
- Lead and chair the Medicaid & Commercial Quality and Operations Committee and lead and co-chair the INTEGRITY and UNITY Quality and Operations Committee.
- Lead and chair the NCQA Steering Committee and changes to the NCQA Standards and Guidelines for Accreditation.
- Track and monitor HEDIS and other clinical quality data in support of Neighborhood's performance on: 1) NCQA Accreditation; 2) EOHHS Medicaid PGP; 3) NCQA Health Plan Rating; and 4) INTEGRITY Quality Withhold.
- Integrating clinical program evaluations results into continuous quality improvement efforts.
- Provide support for measurement and evaluation across Neighborhood to maximize Neighborhood's ability to make data-driven decisions and support day-to-day functions.
- Utilizing the existing committees that support quality improvement to better align with organization's continuous quality improvement Mission, Vision and Core Principles.
- Developing, in collaboration with HR, training tools and topics to support the CQI.
- Training staff on using the quality improvement tools, as necessary.
- Developing and driving the Quality Improvement agenda for the Clinical Affairs Committee.
- Providing leadership role in the QIPs and CCIPs as assigned by the Center for Medicare and Medicaid Services and the Executive Office of the Health and Human Services and as identified internally.
- Facilitating Neighborhood's success in the Medicaid Performance Goal Program, the INTEGRITY Quality Withhold, and other pay-for-performance programs.
- Tracking and monitoring HEDIS data in support of quality improvement activities.
- Tracking and monitoring the CAHPS, HOS, Provider Satisfaction survey data as well as other survey data, in support of quality improvement activities.
- Track and monitor the MDS data in support of monitoring the quality of care provided at nursing facilities.
- Participating in Continuous Quality Improvement Workgroups in support of HEDIS and CAHPS improvement.
- Participate in the Member Satisfaction Workgroup, Clinical Affairs and Clinical Management Committees.
- Facilitating the alignment and integration of CQI with the overall organization in collaboration with the Management Team.

VI. Behavioral Health Quality QI 1A.2, 5

Neighborhood delegates the quality improvement function for behavioral health services to Beacon Health Options, including the involvement of a designated behavioral health practitioner in program implementation and oversight. Neighborhood's Clinical Affairs Committee annually approves Beacon's Quality Improvement Program Description and Work Plan and reviews Beacon's Quality Improvement Annual Evaluation. These documents encompass the behavioral health aspects of the QI program. Beacon staff participates in the HEDIS Improvement Workgroups, as needed. Additionally, Neighborhood collaborates with Beacon to collect and analyze data to monitor and identify opportunities in several areas including but not limited to:

- Exchange of information between PCPs and behavioral health specialists;
- Appropriate diagnosis, treatment and referral of members with behavioral health disorders commonly seen in primary care;
- Appropriate uses of psychopharmacological medications;
- Management of treatment and follow up for members with co-existing medical and behavioral health disorders;
- Implementation of primary and or secondary preventive care behavioral healthcare programs; and
- Behavioral health programs to address the special needs of members with severe mental illness.

VII. Program Staffing and Resources

Each of Neighborhood's departments contributes to the QI Program and is represented in the Medicaid & Commercial Quality and Operations Committee. Through the leadership of the department director and Senior Leadership Representative, each department is expected to participate and work collaboratively on the quality improvement activities that are undertaken organization-wide and at the departmental level to improve the clinical care and service delivered to members. Below are some of the responsibilities of the departments and staff which support the organization's QI Program:

Analytics Staff

In direct support of the Department of Evaluation and Improvement, the Analytics Team performs the following activities:

- Collect and analyze HEDIS data in support of quality improvement activities.
- Lead the Continuous Quality Improvement Workgroups in support of HEDIS and CAHPS improvement.
- Collect, analyze, and report the CAHPS, HOS, Provider Satisfaction survey data as well as other survey data, in support of quality improvement activities.

Care Management Staff

- Oversee case management for high-risk members including those identified through Neighborhood's disease management programs.
- Track clinical program outcomes.
- Conduct outreach and care coordination activities for members who have been identified as being at high clinical and social risk in order to ensure quality, and cost-effective member-centered care.
- Annually evaluate program activities.

- Develop materials and resources with the input of network providers to impart the importance of positive health behaviors to members.
- Implement health education programs for individual Neighborhood members, populations, and/or other community needs.
- Educate members and work with them toward healthy lifestyle behaviors.
- Plan and evaluate health education programs for individual Neighborhood members, populations, and/or other community needs.

Credentialing Staff

- Process provider applications for network entry and recredentialing according to Neighborhood's established credentialing standards.
- Conduct continuous monitoring of provider network through internal and external sources.
- Conduct onsite quality assessment at provider offices for network entry, recredentialing and to address environment of care concerns.
- Maintain the credentialing database with current provider information including state license and board certification information.
- Collaborate with Provider Network Management to maintain network access for Neighborhood's membership.

Evaluation and Improvement Staff

- Coordinate the preparation of the Quality Improvement Program Description, Work Plan, and Annual Evaluation.
- Facilitate the monitoring of the annual Quality Improvement work plan through reporting to the Medicaid & Commercial Quality and Operations and INTEGRITY and UNITY Quality and Operations Committees.
- Lead and chair the Medicaid & Commercial Quality and Operations Committee and lead and co-chair the INTEGRITY and UNITY Quality and Operations Committee.
- Lead and chair the NCQA Steering Committee and changes to the NCQA Standards and Guidelines for Accreditation.
- Track and monitor HEDIS and other clinical quality data in support of Neighborhood's performance on: 1) NCQA Accreditation; 2) EOHHS Medicaid PGP; 3) NCQA Health Plan Rating; and 4) INTEGRITY Quality Withhold.
- Provide support for measurement and evaluation across Neighborhood to maximize Neighborhood's ability to make data-driven decisions and support day-to-day functions.
- Integrate clinical program evaluations results into continuous quality improvement efforts.
- Utilize the existing committees that support quality improvement to better align with organization's continuous quality improvement Mission, Vision and Core Principles.
- Develop, in collaboration with HR, training tools and topics to support the CQI.
- Train staff on using the quality improvement tools, as necessary.
- Develop and drive the Quality Improvement agenda for the Clinical Affairs Committee.
- Provide leadership role in the QIPs and CCIPs as assigned by the Center for Medicare and Medicaid Services and the Executive Office of the Health and Human Services and as identified internally.
- Facilitate Neighborhood's success in the Medicaid Performance Goal Program, the INTEGRITY Quality Withhold, and other pay-for-performance programs.
- Track and monitor HEDIS data in support of quality improvement activities.
- Track and monitor the CAHPS, HOS, Provider Satisfaction survey data as well as other survey data in support of quality improvement activities.
- Track and monitor the MDS data in support of monitoring the quality of care provided at nursing facilities.

- Participate in Continuous Quality Improvement Workgroups in support of HEDIS and CAHPS improvement.
- Participate in the Member Satisfaction Workgroup, Clinical Affairs and Clinical Management Committees.
- Facilitate the alignment and integration of CQI with the overall organization in collaboration with Senior Leadership Team.
- Review and comment on the core Quality Improvement documents submitted by Neighborhood's behavioral health vendor, and facilitate their review by the internal QI Committees.

Grievance and Appeals Unit

- Address and resolve member complaints (grievances).
- Review administrative and non-administrative appeals according to member contracts, regulatory mandates, accrediting standards, and established policies and procedures.
- Communicate with providers for status of appeals, process of appealing, and taking verbal appeals.
- Interact with cross functional areas as required to ensure appropriate and consistent decision making.
- Identify potential quality of care and member safety issues (critical incidents) for review by Quality Assurance staff.
- Conduct analysis and trending of complaints, grievances and appeals and provide monthly, quarterly and annual reports and analysis internally and to appropriate committees and agencies.
- Oversee appeal processes delegated to Beacon for behavioral health services and eviCore for high-end radiology services.
- Co-chair the quarterly Utilization Review and Appeal Review Committee with Utilization Management.

Member Services Staff

- Field all member inquiries regarding eligibility, benefit coverage, claims, special programs and access to care and interact with appropriate staff to achieve resolution.
- Conduct welcome calls via outside vendor to members for the purpose of educating them about the health plan benefits.
- Conduct member education on how to file a grievance and appeal.
- Arrange interpreter services for members.
- Log member complaints and requests for appeals in accordance with established policies and procedures.
- Identify potential quality of care and member safety issues for review by Grievance and Appeals Unit staff.

Pharmacy Staff

- Facilitate review and update of the formularies by the Pharmacy and Therapeutics Committee.
- Review requests for medications with restrictions or requests for non-formulary medications
- Support Member Services, providers and other staff regarding the pharmacy benefit.
- Support care management especially with Transitions of Care.
- The Plan's pharmacist attends the PerformRx P&T Committee for INTEGRITY MMP formulary and pharmacy program.

- Conduct oversight of Neighborhood’s Pharmacy Benefit Manager, mail service provider and specialty pharmacies.
- Inform and notify members, providers, and network pharmacies of medication safety alerts and formulary updates.
- Pharmacists serve as clinical resources to other staff for medication management support.

Provider Network Management Staff

- Manage communications to, and serve as the primary point of contact for network providers.
- Field provider inquiries regarding Provider Agreements and provider manual policies and procedures.
- Work to implement collaborative quality improvement activities with network providers.
- Monitor the availability and accessibility standards at physician offices, including after-hours patient instruction systems.
- Act on improvement efforts as necessary and as identified during the annual provider satisfaction survey.
- Lead in the implementation of alternative payment mechanisms, including incentives to providers for achieving improved quality of clinical care and patient satisfaction.

Utilization Management Staff – Medical Services

- Conduct pre-certification, concurrent, and retrospective analysis of appropriateness of care.
- Provide an annual evaluation of the medical management and utilization management activities to the Clinical Management Committee for the identification of improvement opportunities.
- Track and trend key utilization data.
- Work with the AMD to identify and develop the organization’s Clinical Medical Policies, which detail the medical necessity criteria for coverage of conditional benefits.

VIII. Advisory Groups / Committees

In addition to employing and supporting the quality improvement committees mentioned previously, Neighborhood utilizes the following committees and forums to obtain additional information to guide the organization’s quality improvement efforts. Activities and work undertaken by each of the following groups is reported to the Medicaid & Commercial Quality and Operations Committee.

A. Member Satisfaction Work Group

Neighborhood has as its first priority the health, well-being and satisfaction of our enrolled members. In support of this, the Member Satisfaction Workgroup’s (MSW) mission is to identify, understand and to recommend improvement activities to remove sources of dissatisfaction with health care services for our members.

MSW meets quarterly and is chaired by the Member Experience Advisor. The membership of MSW is comprised of Neighborhood members representing all product lines, and staff from the departments that either interact directly with members or collect data that is informed directly by members.

The Member Experience Advisor reports semi-annually to the Medicaid & Commercial Quality and Operations Committee as well as the INTEGRITY & UNITY Quality and Operations Committee.

To ensure the effectiveness of MSW in improving the member experience at Neighborhood:

- MSW members are responsible to serve as the voice of Neighborhood's members throughout the health plan. By presenting data and listening to the experiences and perspectives of the member, Neighborhood is better able to propose actionable interventions to implement quality improvement activities aimed at improving member satisfaction with the health plan.
- MSW members coordinate and compile member satisfaction-related data identified or generated within their departments / areas of responsibility and present findings to MSW. MSW members are responsible for sharing the recommendations of the workgroup within their departments as well as ensuring the implementation of any improvement recommendations within their areas of responsibility.

B. Member Advisory Committees

The Neighborhood Member Advisory Committees (Children's Medicaid and INTEGRITY) offer Neighborhood an avenue for the voice of the member to be heard and to ensure that the organization's initiatives and program materials are member-centric at all times. These advisory committees provide important assistance to Neighborhood in the identification of members' issues and concerns regarding health care at the individual, organizational, and systemic levels. Advisory committee members work closely with staff on the creation and implementation of quality improvement initiatives addressing member concerns. Committee members have also been valuable in reviewing and improving the health plan's member materials and in testing new systems to ensure member usability. Beyond their role within Neighborhood, advisory committee members have been invited to speak on behalf of our members at the State and Federal level regarding legislation and budget issues.

Each advisory committee is comprised of members and community partners representing the various product lines that Neighborhood serves. The committees meet on a quarterly basis, and communicate and document issues and concerns that are within the scope of Neighborhood's operational responsibilities. The Member Advisory Committees are facilitated by Neighborhood's Member Experience Advisor. The Member Advisory Committees for Medicaid report to the Member Satisfaction Workgroup, which reports to the Medicaid & Commercial Quality and Operations Committee. The INTEGRITY Member Advisory Committee reports to the INTEGRITY & UNITY Quality and Operations Committee, with a dotted reporting line to the Member Satisfaction Workgroup. Both Committees provide input to the Clinical Affairs Committee.

C. CAHPS Work Group

The CAHPS Work Group was created in 2015 to identify opportunities for and barriers to improvement, and develops targeted interventions to improve member satisfaction with the health care experience, and with the health plan overall. Neighborhood uses the results from the annual CAHPS Adult Medicaid survey to identify areas of member dissatisfaction and opportunities for improvement. The CAHPS Work Group meets quarterly to develop, implement and track the progress of interventions designed to improve member satisfaction. An update of the CAHPS Work Group activities is reported annually to M&CQOC.

D. HEDIS Improvement Work Groups

The HEDIS Improvement Work Groups (Women's Health, Pediatrics, Chronic Diseases, Medication Management, and Behavioral Health) analyze the annual HEDIS data to identify

opportunities for and barriers to improvement, and develop targeted interventions to improve performance. The HEDIS Improvement Work Groups meet on a quarterly basis and more frequently if needed, to develop, implement and track the progress of interventions designed to improve HEDIS performance. The HEDIS Improvement Work Groups use the periodic Provider Gap Reports as one of the fundamental interventions to improve performance. The Provider Gap Reports consist of members who are identified as needing specific screenings and other care in order to meet the compliance specifications for multiple HEDIS measures.

IX. Role of Participating Practitioners

The expertise and input of participating practitioners at each of Neighborhood's Community Health Centers, private primary care practices, hospital-based primary care practices, specialty care practices and hospitals are critical to the development, delivery, and success of Neighborhood's Quality Improvement Program. As part of their commitment and contribution to the QI Program, Neighborhood's contracted practitioners, hospitals, and provider sites:

- Commit to abide by the policies and procedures of Neighborhood.
- Demonstrate active involvement and participation in Neighborhood's disease and preventive health management programs.
- Review and adhere to Neighborhood's Clinical Practice Guidelines, preventive health guidelines, and Clinical Medical Policies and offer recommendations for improvement based on community standards.
- Participate on various standing and ad-hoc quality improvement committees.
- Participate and cooperate with medical chart review activities, quality assurance policies and procedures, and audits.
- Work with Neighborhood's Case Managers, Member Services Staff, and Provider Network Management staff to ensure optimal delivery of care and service to members through communication.
- Partner with Neighborhood in quality improvement collaboratives organized at the state-level.

X. Quality Improvement Activities

Clinical Quality Performance Indicators: HEDIS

The purpose of HEDIS is to ensure that health plans collect and report quality, cost and utilization data in a consistent way so that purchasers can compare performance across health plans. Neighborhood uses the annual HEDIS measures to provide network providers with a standardized assessment of their performance in key areas in comparison to plan-wide findings and national benchmarks. Neighborhood conducts analysis of HEDIS results by race and ethnicity, language spoken, gender, age group, primary care provider type, and line of business to better understand clinical outcome patterns and identify areas for improvement. Neighborhood shares and discusses site-specific HEDIS results with high-volume primary care provider sites to encourage collaboration to better improve members' clinical outcomes and improve HEDIS performance annually.

Member Satisfaction: CAHPS Member Satisfaction Surveys

Surveying member satisfaction/experience provides Neighborhood with information on our members' experience with the plan and their practitioners and helps to prioritize the improvement initiatives that are most meaningful to members. Neighborhood uses the results from the annual CAHPS Medicaid Adult survey, the CAHPS Medicaid Children with Chronic Conditions survey, and the Qualified Health Plan Enrollee Experience Survey to identify areas of member

dissatisfaction and opportunities for improvement. CAHPS survey results are supplemented with ongoing and extensive review of member complaints and appeals. Activities to address member satisfaction are overseen by the CAHPS Work Group, Member Satisfaction Work Group and the Manager of Performance Improvement and Accreditation.

Neighborhood uses the following two Getting Needed Care questions from the CAHPS survey as surrogates to assess members' experience with UM processes: 1) Ease of getting care, tests, or treatment needed (Question 14); and 2) Obtained appointment with specialists as soon as needed (Question 25). NCQA-approved custom questions regarding utilization management are also used to assess member satisfaction. The survey results are analyzed by program level and line of business and allow for the identification of program strengths, opportunities for improvement, and the development of targeted interventions where necessary.

Member Satisfaction: Disease Management Member Satisfaction Survey

Neighborhood conducts an annual survey to measure members' satisfaction with the Plan's Disease Management Programs. Members are surveyed to gain information about their knowledge of how to access care, perceptions about the usefulness of program information, the ease of understanding educational materials, and overall satisfaction with the Disease Management Program. Survey results are used to identify areas of member dissatisfaction and opportunities for improvement.

Member Satisfaction: Case Management Member Satisfaction Survey

Neighborhood conducts a Case Management Survey on a monthly basis for a twelve month period, with reporting provided on a quarterly and annual basis. This survey is designed to evaluate member perceptions, expectations, experiences, and satisfaction with Neighborhood's Case Management Programs. Survey results are analyzed by program level and line of business and allow for the identification of program strengths, opportunities for improvement, and the development of targeted interventions where necessary.

Provider Satisfaction Survey

Neighborhood conducts an annual Provider Satisfaction survey to measure provider satisfaction with Neighborhood's administrative and clinical processes. This survey assesses respondents' satisfaction with functional areas within Neighborhood and the Neighborhood network, as well as overall satisfaction and health plan loyalty. The information obtained is used to develop quality improvement initiatives across the organization to increase providers' satisfaction with Neighborhood and to ensure high quality care for Neighborhood members.

Clinical Practice Guidelines

Neighborhood's Medical Director's Office develops and/or adopts and maintains clinical practice guidelines consisting of current, peer-reviewed, evidence-based standards of care. The clinical practice guidelines identify the Plan's expectations of its network and serves as a clinical resource to providers. Clinical practice guidelines for behavioral health are developed by Neighborhood's behavioral health vendor. The Clinical Affairs Committee reviews and approves the organization's clinical practice and preventive care guidelines. The guidelines complement and reinforce the established medical philosophy and benefit coverage offered by the Plan. Clinical Practice Guidelines are updated no less than every two (2) years and are accessible to network practitioners via the Neighborhood website.

Disease Management and Wellness

Neighborhood's Care Management staff work collaboratively with community partners including, but not limited to Neighborhood's provider network, the Rhode Island Department of Health, the

Executive Office of Health and Human Services, and the Rhode Island Health Center Association, to identify health program and project opportunities that align with the health needs of our members and the community. Programs are planned, implemented and monitored with the goal of achieving positive health outcomes for members and focus largely on preventive health, health promotion, disease management, and patient safety. Program implementation requires the development of member and provider educational materials and ongoing interaction and outreach to members. Neighborhood's disease management programs strive to: support the relationship between practitioners and their patients and reinforce the established plan of care; emphasize the prevention of exacerbations and complications utilizing cost-effective evidence-based practice guidelines and patient empowerment strategies such as self-management and patient education and outreach; and continuously evaluate clinical and financial outcomes with the goal of improving overall health and efficient plan performance. Neighborhood's current programs include: asthma, diabetes, tobacco cessation, chronic obstructive pulmonary disease, congestive heart failure and coronary artery disease.

Peer Review Activity

The Chief Medical Officer (CMO) manages the peer review process internally for presentation and review by the Clinical Affairs Committee. Cases requiring peer review are identified through member or provider complaints, utilization review and other sources. The CMO and Medical Director staff directly perform peer reviews and will engage external specialty peer review when indicated, in accordance with Neighborhood's Policies and Procedures. When quality of care concerns are identified, they are reported to the Clinical Affairs Committee for review and recommendations. In accordance with Neighborhood's Professional Review Action policies and procedures, any required remedial and disciplinary action is taken in a timely manner per policy guidelines and as directed by Neighborhood's Clinical Affairs Committee.

Actions to Address Quality of Care Complaints

All complaints and/or concerns received from members, providers, Neighborhood staff, state agencies, and other entities relative to the quality of care or clinical services rendered to members are forwarded directly to the Quality Assurance Specialist who coordinates the investigation and prepares the findings to be reviewed with the Medical Director or other staff physician assigned to the case. The physician and the Quality Assurance Specialist collaborate to complete the investigation, make determinations, and when required, notify external entities such as the RI DOH about cases. As needed, the physician and the Quality Assurance Specialist also create and monitor corrective action plans, which are shared with and guided by the Clinical Affairs Committee (CAC). Complaints deemed to be issues of quality of care by the QAC are reported to the CAC on a regular basis. The CMO reviews the quality of care complaints and concerns in accordance with Neighborhood's established policies and procedures.

Quality Improvement Projects

Neighborhood conducts Quality Improvement Projects (QIPs) in compliance with the Executive Office of the Human and Health Services (EOHHS), HealthSource RI and the Centers for Medicare & Medicaid Services (CMS) requirements. The QIPs are annually reported to the appropriate agencies. QIPs are usually focused on one or more clinical and/or non-clinical areas with the goal of improving members' health outcomes and experience. The QIPs are generally conducted over a three-year period.

Chronic Care Improvement Programs (CCIP) – INTEGRITY MMP

Neighborhood is required to conduct a CCIP based on the Centers for Medicare & Medicaid Services requirement. The objective of Neighborhood's CCIP is to improve the health status of its

eligible members who are at risk for multiple chronic conditions. This objective is achieved through member education as well as assisting members in managing his or her condition or illness. The result of the CCIP will be annually presented at the INTEGRITY & UNITY Quality and Operations Committee.

Activities to Improve Patient Safety QI 1A.3

The following activities are undertaken as a demonstration of Neighborhood's commitment to improve clinical quality of care and ensure the safety of its members:

- Comprehensive site assessments during the credentialing and recredentialing process for those providers who meet the designated criteria to ensure that patient care sites meet Neighborhood's standards for safety and cleanliness.
- Additional site visits for any complaint about site environment including those about safety, physical access, and cleanliness.
- Continuous monitoring of entire network's licensing status and exclusion listings.
- Notification to the GAU and Quality Assurance Specialist of any potential quality or safety cases (e.g., significant provider errors including pharmaceutical errors, unexpected deaths, missed diagnoses or treatments, missed follow-up, or insufficient discharge planning).
- Investigation and tracking of quality of care complaints, identification of trends, institution of increased monitoring as appropriate.
- Monitoring of reportable events for long-term care facilities which include but not limited to falls, suspected abuse and/or neglect, medication errors, pressure ulcers, urinary tract infections, antipsychotic medication use, and/or preventable hospital admissions from the long-term care facilities.
- Monitoring of Provider-Preventable Conditions ("Never Events") and Healthcare Acquired Conditions in inpatient facilities.
- Monitoring of critical incidents including but not limited to hospitalizations, suspected abuse, medication error resulting in ER visits and /or hospitalization, severe injury, theft against member and unexpected death.
- Committee review and consideration of new technology, new uses of existing technology, and new pharmaceuticals to ensure the safety, efficacy, and effectiveness of each.
- Pharmacy Home Program – members with high risk dispensing patterns (multiple opioids, benzodiazepines, prescribers, and pharmacies are assigned to one Pharmacy Home).
- Notification to patients and providers of medications recalled by the FDA and other risks related to pharmaceuticals.
- Drug Utilization Reviews for other high risk patterns include: concurrent second generation antipsychotics, 4 or more concurrent psychotropics for 18 years and under, dangerous drug combinations. Providers are notified by mail or phone call depending on risk level.
- Care coordination discharge planning to ensure safe transitions, medication reconciliation, and follow up.
- Case and utilization managers have access to data across the continuum of care including inpatient, outpatient, and pharmacy. Care is also coordinated with onsite behavioral health clinicians.
- Care Coordination High Risk outreach programs for ER, readmissions, and poly-pharmacy.
- Targeted and general member educational outreach (Member Newsletters or telephonic outreach).

Neighborhood's annual work plan encompasses additional patient safety activities planned for each upcoming year.

Objectives to Enhance Service to a Culturally Diverse Membership QI 1A.8

Neighborhood's membership is comprised of people from diverse cultures with differing needs. Neighborhood serves low-income families, recent immigrants, diverse racial and ethnic groups, people of all ages, people with disabilities, and people who may identify as gender fluid and/or as Lesbian, Gay, Queer, and Transgender. Its stated mission is to secure access to high quality, cost-effective health care for Rhode Island's at-risk populations. In order to improve its ability to serve its culturally and linguistically diverse membership, Neighborhood undertakes the following efforts and initiatives:

- Works to improve the completeness and accuracy of the information on members' race, ethnicity, language spoken, disability status, and geographic location, in order to understand and respond to the diversity in its membership.
- Works to improve the completeness and accuracy of the information on practitioners' race, ethnicity, language spoken, and geographic location in order to understand and respond to the diversity in its membership.
- Analyzes its HEDIS and CAHPS data in particular, and other data as appropriate, to identify gaps in access and quality of care based on race, ethnicity, language spoken, age and other characteristics.
- Presents the results of data analyses identifying disparities in access and quality of care and in services to members to the Medicaid & Commercial Quality and Operations Committee and/or to the INTEGRITY & UNITY Quality and Operations Committee, Neighborhood's internal quality improvement committees to identify opportunities for improvement.
- Assesses the language spoken by its network practitioners and Member Service staff, as well as the adequacy of the telephonic interpreter services available, to identify and address any gaps relative to the language needs of its membership.
- Assesses the geographic adequacy of its physician network for groups who speak languages other than English.
- Includes members that are representative of the diversity of its membership's culture and language in all advisory committees and ad hoc work groups to help assure that all members' needs are being considered by these groups.
- Conducts marketing efforts that outreach to culturally and linguistically diverse populations to maintain and expand its market share among these populations.
- Makes an organizational-wide commitment to diversity of staff and management.
- Develops member materials that are targeted to the expected reading level and the languages spoken by its members.
- Ensures the availability and accessibility of cultural linguistic services such as 24/7 interpreting services including the American Sign Language.
- Training and education to better serve members of the LGBT community.

Objectives to Enhance Services to Members with Complex Health Needs QI 1A.9

Neighborhood's membership is comprised of people with differing health and social needs. The Plan's mission is to be a catalyst for improved access and better health in Rhode Island, especially for vulnerable populations. Neighborhood works to ensure the delivery and coordination of services for members with complex health needs including those receiving Long Term Services and Supports (LTSS) through integrated case management and complex case management that address their needs. Members identified for the Programs include those with multiple chronic conditions, physical or developmental disabilities, and members with severe mental illnesses. The Plan's case managers assess the needs of these members and work with practitioners, members and their care givers to support the physical, social and emotional aspects of chronic illness to help them regain optimum

health. The objectives for serving our members with complex health needs include but are not limited to:

- Ensure that needed services identified through the assessment processes are obtained and that any existing gaps or barriers to necessary services are addressed and/or eliminated.
- Assist members in achieving an optimal level of wellness and function by facilitating timely and appropriate health care services.
- Improve access to primary and specialty care by facilitating timely and appropriate health care services, thus helping members with complex health needs achieve an optimal level of wellness and function.
- Coordinate community services for members with complex needs living in the community.
- Ensure the integration of medical and behavioral health services.
- Decrease care fragmentation and optimize resource utilization inclusive of the member and/or family in the decision making process at every opportunity.
- Provide home-based care through Health@Home as appropriate.
- Provide transitions of care support to members with multiple chronic conditions.
- Collaborate with member's providers to ensure continuity and coordination of care.
- Educate members in self-advocacy and self-management.
- Improve the member's and family's/caregiver's satisfaction with the health care delivery system.

Annual Evaluation and Work Plan Development [QI 1A.7](#)

Neighborhood conducts an annual evaluation of its QI Program, inclusive of the activities undertaken and monitored by Neighborhood's QI committees, subcommittees and workgroups. Neighborhood uses the annual evaluation as an opportunity to make program revisions and identify work plan objectives and activities for the upcoming year. Annually, all contributors, DEI staff and the Chief Medical Officer review the draft annual Quality Improvement Program Evaluation, Program Description and Work Plan in whole or in part. The Chief Medical Officer presents the Annual Evaluation, Program Description, and resulting Work Plan to the Clinical Affairs Committee for review and recommendation to the Board of Directors for final review and approval. The status of all Work Plan items are reviewed and updated quarterly. The Work Plan is a fluid document and subject to ongoing revisions and updates throughout the year.

XI. Delegation [QI 1A.1](#)

Contractual agreements between Neighborhood and any delegated group, agency, or organization specify the responsibilities of both parties; the functions or activities that are delegated; the frequency of reporting on those responsibilities and functions to Neighborhood; the process by which performance is evaluated; corrective action plan expectations, when identified as necessary; and lastly, termination for cause language in the event expectations are not fulfilled. Responsibility for the oversight of delegated activities lies with designated Neighborhood Account Managers. Delegates are monitored according to a regular reporting schedule overseen by the responsible Account Managers. Additionally, Neighborhood's committees assist in the oversight process, as indicated:

- Monthly, Neighborhood's Clinical Affairs Committee (CAC) reviews and accepts practitioners credentialed and recertified by its delegates. Neighborhood retains the ultimate authority to approve, terminate, or suspend individual practitioners or providers when warranted.

- Annually, Neighborhood's Clinical Management Committee reviews and recommends modifications to each delegate organization's Utilization Management Program Description, Annual Evaluation, and Work Plan.
- Annually, the delegate's Quality Improvement Program Description and Work Plan are reviewed and approved by the Plan's Clinical Affairs Committee, after review and comment by the Plan's internal quality improvement committee.
- Annually, the delegate's Quality Improvement Annual Evaluation is reviewed by the Plan's Clinical Affairs Committee, after review and comment by the Plan's internal quality committee.

In the event that oversight activities reveal opportunities for improvement, Neighborhood's responsible Account Manager or Director works with the delegate to develop a corrective action plan and monitors the delegate's activities to fulfill the corrective expectations.

XII. Confidentiality / Conflict of Interest / Compliance

Confidentiality / Conflict of Interest

Neighborhood's QI Program maintains the confidentiality of members and providers as required by federal and state law and regulation. Electronic and paper reports, minutes, phone logs, medical records or and any other information generated are specifically excluded from release or discoverability except as allowed by federal or state laws. All information is protected in accordance with current peer review privacy and confidentiality acts and access to member information is granted on a need-to-know basis. All Neighborhood employees are responsible to read and sign a Confidentiality Agreement and Code of Conduct at the start of their employment or assignment with Neighborhood, and thereafter on an annual basis. To avoid potential conflict of interest, all internal staff, Physician Reviewers, and Physician Consultants involved in the planning or delivery of a treatment plan do not participate in medical review decisions. Medical review decisions are not made with regard to financial incentives.

Compliance

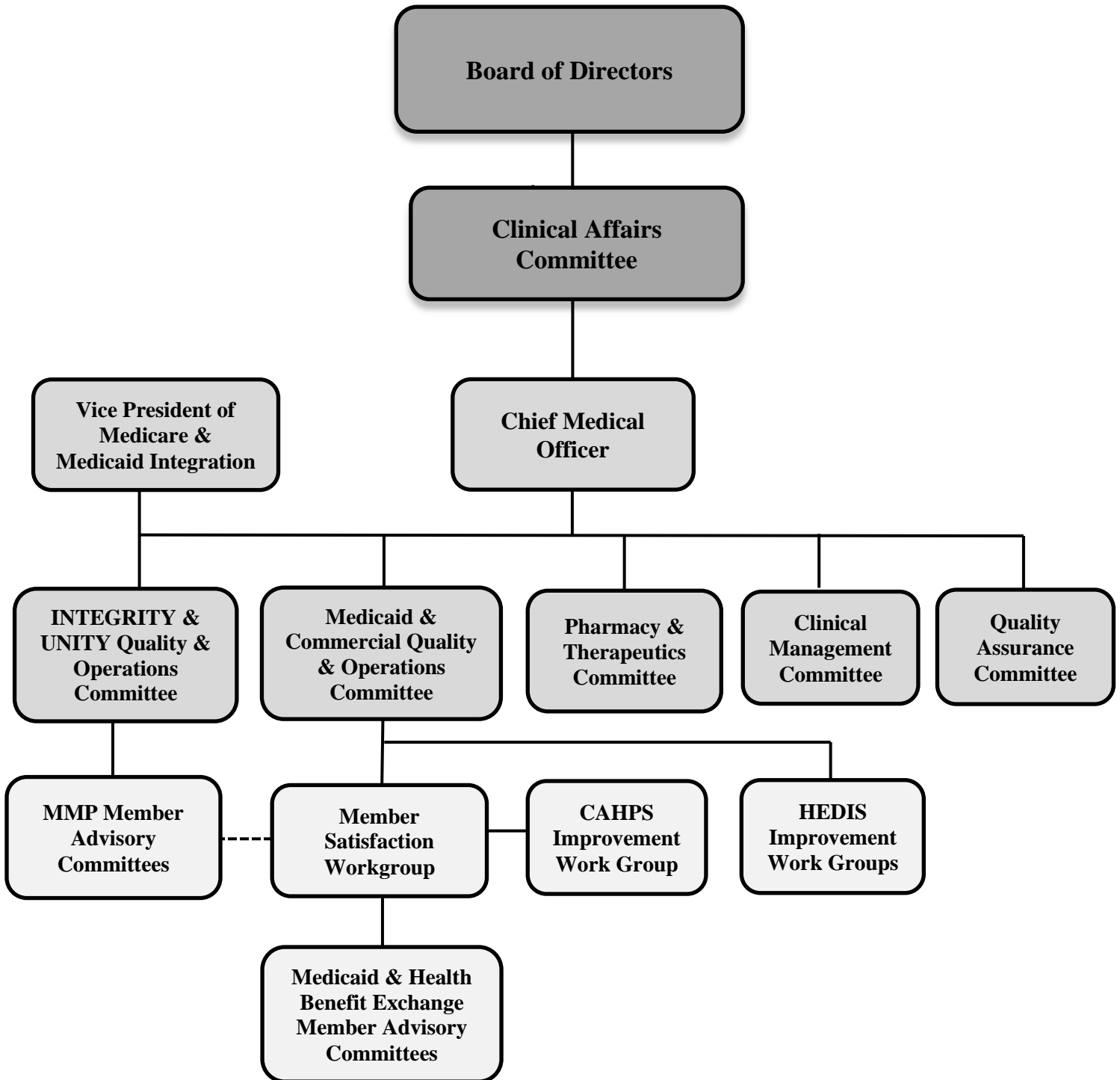
Neighborhood has an enterprise-wide Compliance Program that fosters a culture of integrity and trust and promotes legal and ethical behavior that is consistent with federal and state laws, contractual requirements, corporate policies and procedures and our Standards of Business Conduct (Standards). Neighborhood's Compliance Program communicates the organization's expectation that compliance is everyone's responsibility and all employees and other stakeholders are expected to do the right thing by conducting business with the highest ethical standards, adhere to laws, rules, regulations, corporate policies and procedures and established standards of conduct governing business activities.

Neighborhood's Compliance Program:

- Demonstrates to employees, the Board of Directors, regulatory bodies and the community at large the organization's strong commitment to honest and responsible corporate conduct;
- Formalizes its internal controls to assure compliance with state and federal regulations, contracts, policies and procedures and Standards of Business Conduct;
- Provides mechanisms to quickly and accurately react to operational compliance concerns, and effectively target resources to address these concerns;
- Addresses suspected fraud, waste and abuse by corporate officers, executives, directors, managers, employees, providers of healthcare services, vendors, sub-contractors and anyone working on behalf of Neighborhood;

- Improves (clinical and non-clinical) quality of care and service;
- Increases the identification and prevention of unlawful and unethical conduct;
- Creates and reinforces an environment that encourages employees to report potential compliance problems and concerns; and
- Allows prompt and thorough investigation of possible misconduct by corporate officers, executives, directors, managers, employees, providers, vendors, subcontractors and anyone working on behalf of Neighborhood.

Neighborhood Health Plan of Rhode Island
 Quality Improvement Structure [QI 1A.1](#)
 Appendix A



Appendix B: Quality Committee Reports

Overview: The Clinical Affairs Committee, the Plan’s Board-designated Quality Improvement Committee, and the Quality Improvement supporting committees follow a monthly calendar of standard reporting to facilitate Quality Improvement throughout the organization. The reports listed under each Committee represent a sample of the standard reports presented annually. Additional reporting is added as needed to meet the Neighborhood’s needs.

Clinical Affairs Committee Reports	Medicaid & Commercial Quality & Operations Committee Reports	INTEGRITY & UNITY Quality & Operations Committee Reports	Pharmacy & Therapeutics Committee Reports	Clinical Management Committee Reports
Clinical Practice Guidelines	Access and availability Reports	Member Assessment Report	Class Reviews (including utilization trends)	UM Program Description
Quality of Care Issues	Network Adequacy Reports	Critical Incident Report	Quality Improvement Activities	UM Program Evaluation
Performance Monitoring	CAHPS & QHP Results	Nursing Home Transitions Report	Review of Delegated MMP/INTEGRITY Formulary Changes	UM Program Work Plan
Disciplinary Action	HEDIS Results	Nursing Home Quality Report	New Drug Reviews	Clinical Medical Policies
QI Program Description, Work Plan & Evaluation	QI Program Description, Work Plan & Evaluation	Denials / Appeals Reports	Quarterly Minutes	Clinical Necessity Decision Criteria
HEDIS & CAHPS Results	Provider Satisfaction Survey Results	Complaints (Grievances) Report		Delegated Entities Utilization Reports
Provider Satisfaction Survey Results	Call Performance Reports	QW Performance Dashboard		Technology Assessment
BH Reports (HEDIS)	BH Reports (Surveys, call performance, HEDIS results)	QI Projects Reports (Progress & Intervention)		Inter-rater Reliability Reports
Pharmacy Updates	Denial / Appeals Reports	Personal Choice Report		Utilization Reports
M&C QOC & I&U QOC Reports	Member & Provider Complaints Reports	LTSS Oversight Report		Clinical Appeals & Denials
Program Evaluations	Credentialing / Recredentialing TAT Report	MMP Call Performance Report		Member and Provider Satisfaction with UM Reports
	DM Annual Summaries	Pharmacy Utilization Report		
	QI Projects (Progress & Interventions)	Member Screening (Fall Risk) Report		
	Claims Report	CAHPS MAPDP Results		
	EOHHS Incentive Dashboard	MMP HEDIS Results		