<b>DEPARTMENT:</b> Clinical Operations Group –	POLICY DESCRIPTION: Purging of eCQM
Clinical Data & Analytics   PROM	Records within the hCQM application
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EFFECTIVE DATE: February 1, 2025	REFERENCE NUMBER COG.CQM.001
APPROVED BY: Ethics and Compliance Policy Committee	

**SCOPE:** All HCA affiliated colleagues responsible for requesting, performing, supervising, or monitoring the Electronic Clinical Quality Measures (eCQM) data purge process within the HCA Clinical Quality Measures (hCQM) application.

**PURPOSE:** To define a standardized process for purging hCQM patient records that do not meet the population definition for eCQM measure(s) in accordance with The Joint Commission (TJC) eCQM Specifications and the Centers for Medicare & Medicaid Services (CMS) Specifications Manuals. These patient records may not meet these specifications due to data quality issues originating within the Electronic Health Record (EHR), its use, or operating status.

This policy does not include provisions for Data Corrections; in the context of this process, a Data Correction is a separate action to be completed within the EHR by the end-user, or through a diagnosis coding request made to Health Information Management (HIM).

**POLICY:** Consideration will be given to remove a record from the hCQM database when it does not meet the criteria for inclusion. The HCA Healthcare <u>Clinical Data & Analytics Department</u> can approve a facility's request to purge a record only if it meets the criteria for purging. This policy is intended to preserve the integrity of data captured by the hCQM application and eCQM data reporting to governing agencies.

- 1) All purge requests must be:
  - a) Submitted appropriately through the hCQM application form;
  - b) approved by the Clinical Outcomes Program Manager or Clinical Analytics leadership;
  - c) tracked within the hCQM application; and
  - d) supporting documentation for the purge request must be attached to the hCQM purge request at the time the request is made.
- 2) Sufficient supporting documentation consists of:
  - a) Patient Account Number (include all account numbers affected in the encounter)
  - b) Patient medical record number (MRN) (include all MRN numbers affected in the encounter)
  - c) Patient DOB
  - d) Date of Service
  - e) Audit trails indicating merged account activity or status change (if applicable)
  - f) Explanation of scenario resulting in fallout or and/or merged accounts (if applicable)
  - g) Documentation of EHR or network downtime occurrence (if applicable)



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- h) Documentation demonstrating a "straddle account" with patient account numbers from both originating EHR and newly implemented EHR (if applicable)
- 3) Records meeting the criteria for purging from the hCQM database are as follows:
  - a) <u>Merged Accounts | One MRN</u>: Instances in which two unique patient account numbers are merged for one episode of care within the EHR, and both accounts remain within hCQM. Supporting documentation must be submitted with this request.
  - b) <u>Merged Accounts | Two MRNs:</u> Instances in which two unique patient account numbers are merged with two unique MRNs for one episode of care, and both MRN numbers and account numbers remain in hCQM. Supporting documentation must be submitted with this request.
  - c) <u>Downtimes:</u> EHR downtimes resulting in incomplete documentation or documentation done outside of the EHR. Requires documentation of downtime occurrence (i.e., ITG Planned Downtime Flash Alerts, ITG Incident Response Flash Alerts for unplanned downtimes, or EHR audit trails indicating an interruption of service for the specific time period).
  - d) <u>Status Changes</u>: Instances in which patient status changes within the EHR result in a measure fall-out. (i.e., ADM-IN to OPS). Sufficient documentation should be submitted with this request.
  - e) <u>Straddle Patients:</u> One or more patient records are affected by a new EHR implementation cutover process. Sufficient documentation should be submitted with this request.
- 4) <u>Non-Acceptable Purge Requests:</u> Any request or fall-out instance that is a result of a data entry or data quality error that could have been reasonably been corrected within the EHR. hCQM guidance maintains that end-users should monitor outcomes on a weekly basis to correct documentation errors within the EHR time constraints. Furthermore, consistent monitoring allows for the timely submission of any ICD10 coding reviews/changes to Clinical Data and Registry Abstraction (CDRA) if necessary.
- 5) The record will remain in open status until it is either approved or denied and completed in hCQM.
- 6) Patient records in hCQM are purged at the end of the fiscal quarter in which the patient was discharged.
- 7) Purging an eCQM record could result in a decrease in eligible population/patient encounters for all eCQM measures, as well as hybrid measures. This can potentially impact individual facility performance rates.



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# PROCEDURE:

#### **ITG Responsibilities**

- 1. ITG Product Analysts will assist with manual patient record analysis within the EHR or hCQM database, if necessary.
- 2. ITG Product Analysts will submit JIRA tickets to ITG hCQM developers for approved purge requests.
- 3. hCQM developers will purge the requested patient record at the end of the respective fiscal quarter.
- 4. Patient record purge request is manually logged with an ID number and JIRA ticket in the hCQM application user interface.
- 5. Once the data purge is complete, the requesting user is notified via email.

All purge requests are subject to audit by COG Clinical Data & Analytics | Quality Outcomes & Reporting

## **CSG Responsibilities**

The CSG Clinical Data & Analytics department will:

- 1. Perform initial review and analysis of all hCQM purge requests through EHR and hCQM.
- 2. Provide initial notification of purge request acceptance or denial to the requesting user via email.
- 3. Monitor and trend all purge requests.
- 4. Maintain a record of purged cases within the hCQM application, making it available to TJC, CMS, HCA Healthcare Internal Audit, and other oversight entities upon request.

## **DEFINITIONS:**

**hCQM** - A proprietary application used internally to report eCQM measures and analyze outcomes.

**JIRA** - An agile method project management platform.

#### **REFERENCES**:

- 1. The Joint Commission eCQM Specifications
- 2. CMS eCQM Specifications-eCQI Resource Center