

NCQA Evaluation and HIPAA

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General Counsel

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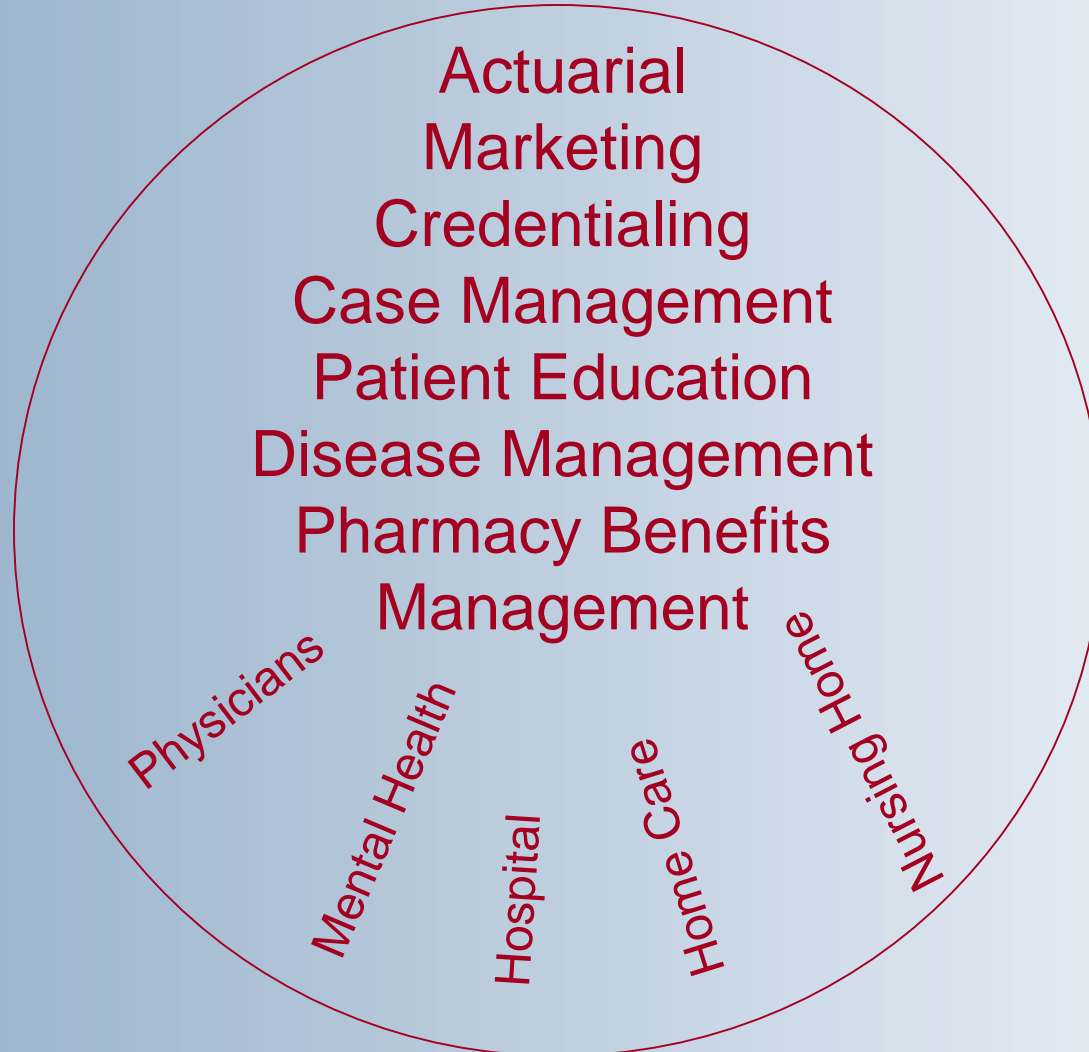
Mission

To improve the quality of healthcare delivered to people everywhere

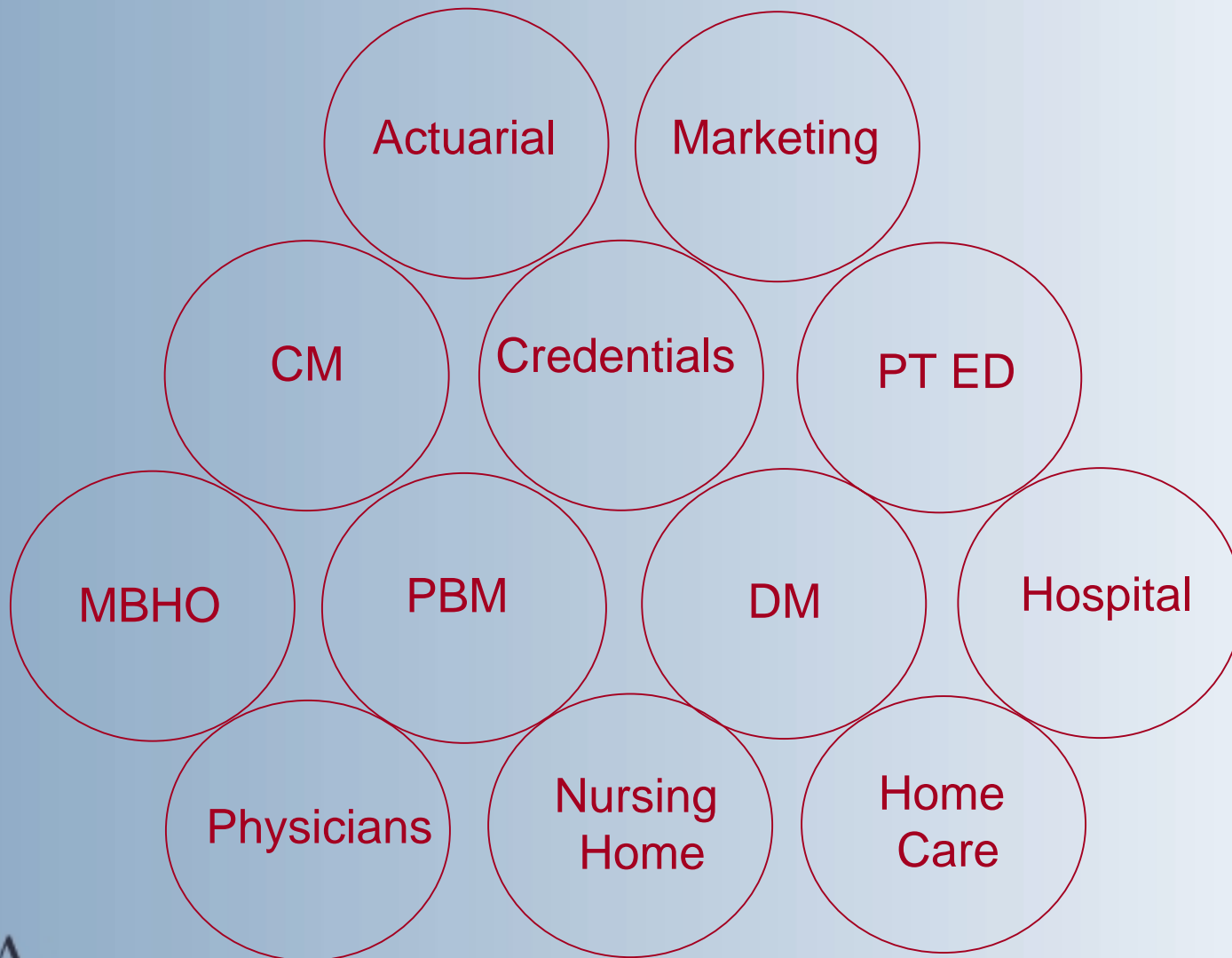
Vision

To become the most widely trusted source of information driving health care quality improvement

Integrated HMO



Disaggregated System



Common Evaluation Characteristics

NCQA evaluation will include:

- **Common privacy and security characteristics** across all products
- **Credible design elements** that instill trust in users of our information
- **Data** that enables value-based purchasing
- **The trust of regulators** (NCQA is experienced at evaluating key consumer protections and collecting and assessing quality information)

NCQA Evaluation Over Time

Evaluation Products

- MCO Accred.
- MBHO Accred.
- CVO Certification
- PO Certification
- PPO Accred.
- VA Biomedical Research
- POA (California...National)
- DM Accred.
- PBM Certification
- Other E-Health Certification

Information Products

- Quality Compass
- State of Managed Care
- Health Plan Report Card
- Customized Report Card
- Private Label Report Cards
- Decision Support
- Research Publications

Future Evaluation Priorities

- Disease management vendors
- Pharmaceutical benefit managers
- Point of care solutions (hand-held computers)
- E-business standards for health plans
- Health Internet sites
- Information for consumers, purchasers, providers based on above

Evaluation Priorities

Priorities reflect

- Disaggregated units of the health care system
- Need for better data to improve care
- Need for efficiency in health care delivery
- Move towards consumer-driven system

Common Areas

- Privacy, confidentiality
- Handling of advertising, sponsorships
- Use of clinical evidence
- Opportunities for patient feedback
- Patient safety
- Use of data

Privacy, Confidentiality

- NCQA's HMO and PPO standards currently require:
 - Confidentiality policies and procedures reviewed by designated internal committee
 - Contracts with providers state expectations about confidentiality of member information and records

Privacy, Confidentiality (cont.)

- Member-identifiable information shared with employers only with specific consent from members
- Policies shared with prospective members
- Policies on access to medical records and member medical information shared with members and providers

Future Standards

- Future standards may address:
 - Security (NCQA currently does HEDIS® audits and licenses audit organizations)
 - Privacy
 - Information used for intended purpose
 - Consumer disclosure statement
 - Informed consent
 - Right to access and amend information
 - Record of disclosures

Future Compliance

- NCQA is committed to facilitating the efficient exchange of electronic data to improve health and protect privacy
- Standards for all types of health care organizations will need to be compliant with HIPAA
- NCQA will need to be HIPAA compliant (e.g. HEDIS and survey data)
- NCQA believes there will be opportunities to combine HIPAA compliance reviews with other NCQA reviews

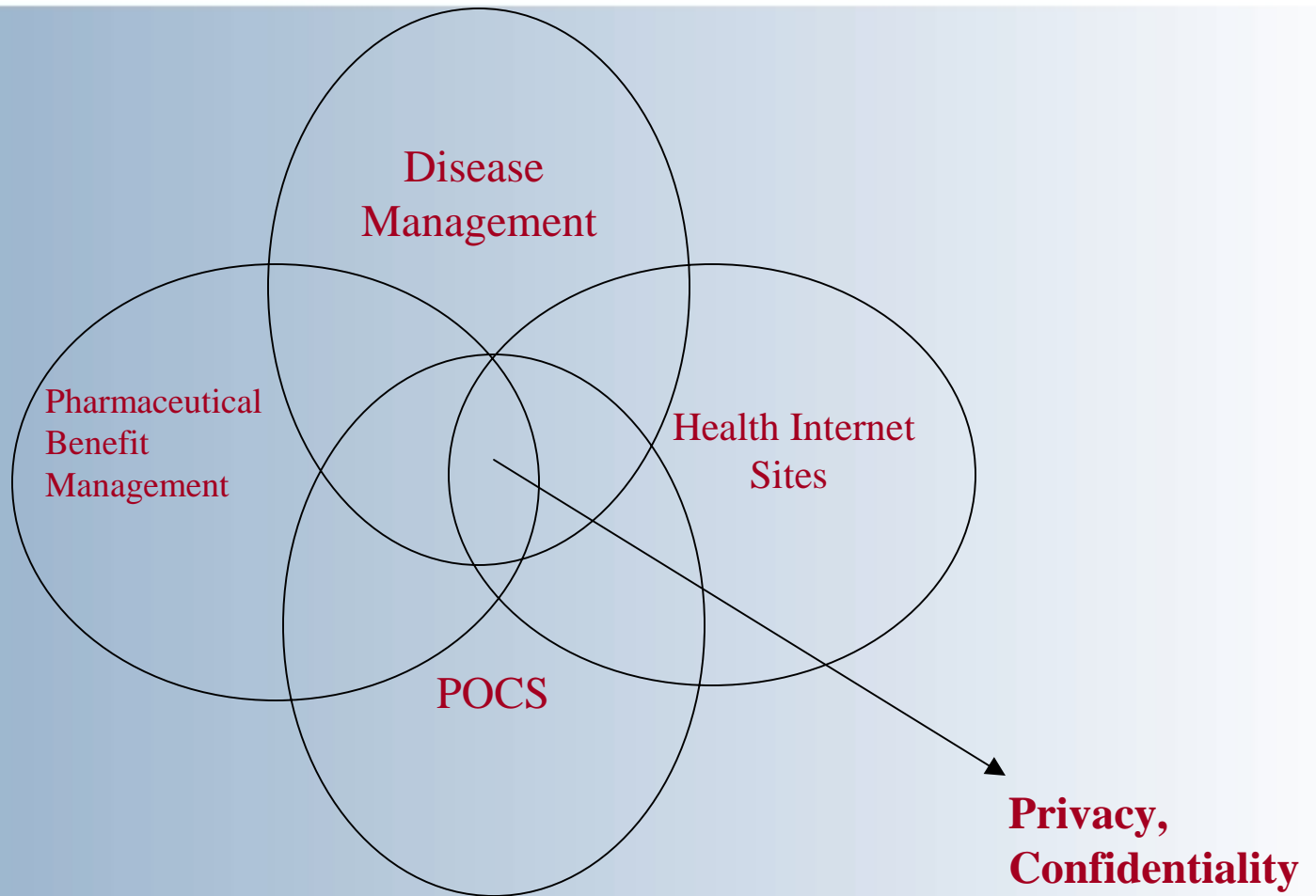
Related concerns

- Beyond areas strictly covered by HIPAA, the proliferation of electronic health information raises concerns
 - **Disease Management** - scientific basis; qualifications of staff; issues related to advertising; sponsorships; patient safety; uses of data
 - **Point of Care Solutions** - scientific basis; issues related to advertising; sponsorships; patient safety; uses of data
 - **PBMS** - scientific basis; patient safety; uses of data

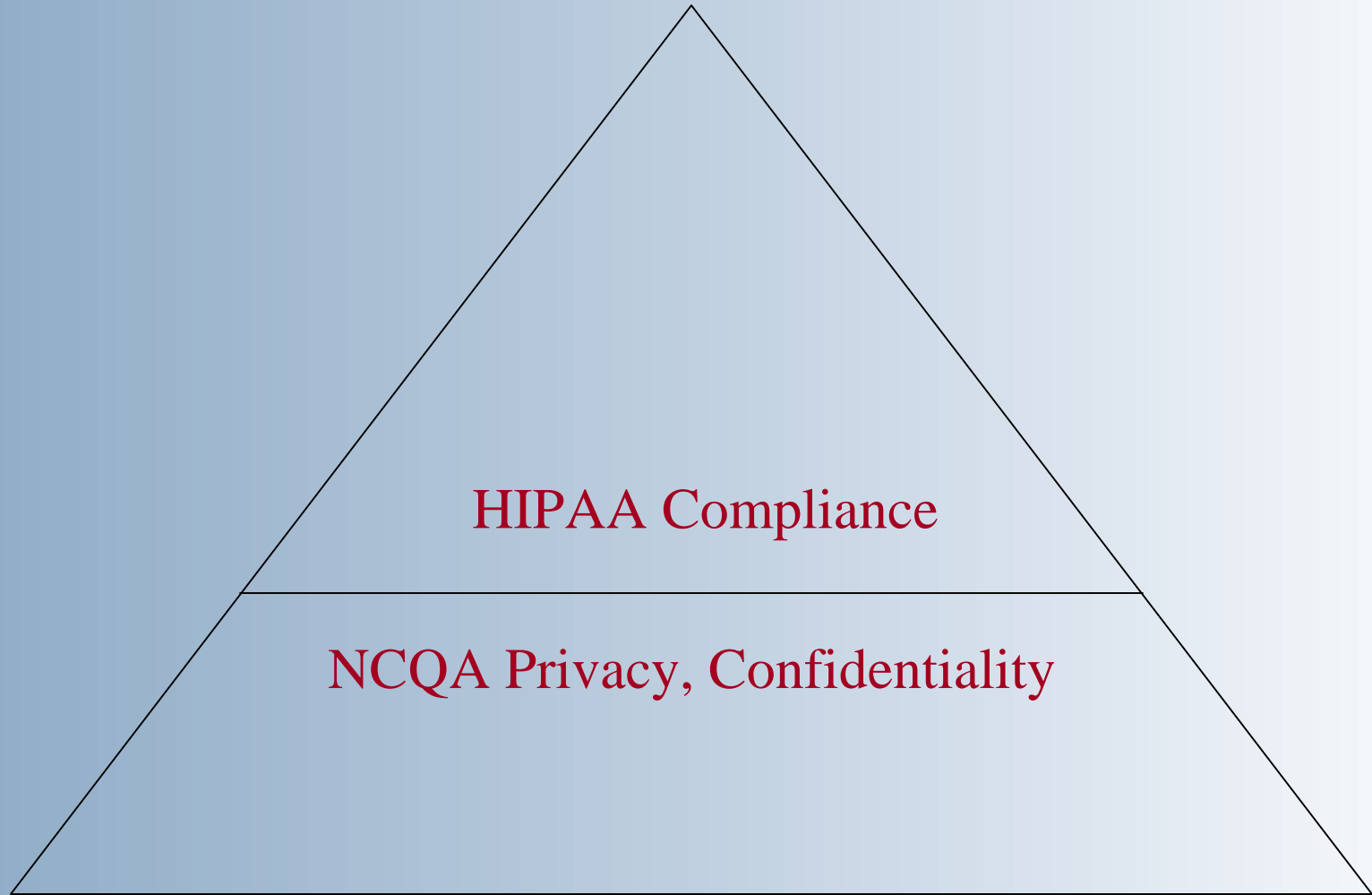
Related concerns (cont.)

- **Health Internet Sites** - scientific basis; qualifications of staff; issues related to advertising; sponsorships; uses of data

2000-2001-2002



2001-2002



2000-2001-2002

- NCQA plans to develop a suite of evaluation products to address
 - privacy, confidentiality
 - scientific basis for content
 - treatment of advertising, sponsorships
 - patient safety
 - appropriate uses of data

2000-2001-2002 cont.

- These standards will be applied to a variety of health care settings
- HIPAA compliance will be part of this strategy