

Final Statement of Reasons

CALIFORNIA CODE OF REGULATIONS

TITLE 22, DIVISION 7, CHAPTER 10, HEALTH FACILITY DATA ARTICLE 8: PATIENT DATA REPORTING REQUIREMENTS

Sections 97215, 97225, 97226, 97227, 97228, 97229, 97231, 97244, 97247, 97248, 97258, 97259, 97260,
97261, and 97264

Update to Initial Statement of Reasons

No modifications have been made to the proposed regulations.

Incorporation by Reference

The below files have been incorporated by reference. The below documents have always been incorporated by reference, because they are lengthy and detailed. In addition, it is ordinary business practice for facilities to access these “format and file specifications” in separate documents. Finally, this is merely an update to existing documents which are already in use.

1) **FORMAT and FILE SPECIFICATIONS for MIRCAl ONLINE TRANSMISSION: INPATIENT DATA**

Effective with discharges occurring on and after: October 1, 2014

Revised: April 14, 2014

2) **FORMAT and FILE SPECIFICATIONS for MIRCAl ONLINE TRANSMISSION: EMERGENCY CARE AND
AMBULATORY SURGERY DATA**

Effective with encounters occurring on and after: January 1, 2015

Revised: April 14, 2014

Summary and Response to Comments Received During the Notice Period of June 6, 2014 through July 21, 2014.

During the comment period four comments were received by the Office of Statewide Health Planning and Development (the Office). Three of the comments were inquiries related to the proposed regulatory action which were answered by the Office’s staff. One of the comments was a comment supporting the proposed regulatory action.

Comment 1:

Good Afternoon Peter,

In the attached Format and File Specifications for MIRCAl Online Transmission: Inpatient Data on Page 16 in regard to the proposed disposition codes in the list effective on and after January 1, 2015 there appears to be no code for Acute Care Discharges Within this Hospital. In the current list of Disposition

Codes effective with Discharges through December 31, 2014, there is a code 02 - Acute Care within This Hospital.

We are an acute hospital with a Psychiatric Ward and in order to capture accurate visit information we disposition/discharge our patients from the Acute Nursing Units and admit them to the Psychiatric Unit throughout a patient's visit depending on the nature of their care/acuity. With no disposition proposed for Acute Care Within this Hospital how would we disposition these patients going from the Psychiatric Unit to an Acute Nursing Unit?

Thank you for your time and consideration.

Response 1:

Good Afternoon,

After reviewing all the disposition codes and the UB 04 manual it appears as if (02 below) would fit this situation.

The UB 04 manual (pg. 44) suggests to code to the highest level of care that is known and judgment must be used in all cases.

The question brings up an interesting point; perhaps the old codes & new codes should be mapped or cross referenced for consistency in OSHPD response.

02: Discharged/transferred to a short term general hospital for inpatient care

Comment 2:

- Require that each record that is submitted to OSHPD include a valid "Principal Diagnosis".

Can you give further clarification regarding this proposed regulatory change as I do not see anything specifically referencing in on the OSHPD website. What do you mean by "valid" is that meant that simply it is a valid ICD-9-CM diagnosis code, that the diagnosis code is submitted in the correct format, or is there a list of diagnosis codes that OSHPD will consider as valid diagnosis for principal diagnosis code selection?

Thanks

Response 2:

Hi Melissa,

The proposed regulatory change for Principal Diagnosis would require a "valid" code, and by this we mean that a ICD-9-CM diagnosis code is submitted in the correct format.

Comment 3:

Good morning Peter, my name is Lisa and I am an Analyst for Adventist Health I.T.

I received a notice on the OSHPD Proposed Regulations on June 5th, and I was wondering if you know when bullet 2 and 3 below become effective?

Thank you

Response 3:

Hi Lisa,

I apologize for the late reply. I had thought I had sent you a response I had prepared. It appears I have not.

The changes to the "disposition of patient codes" for inpatient datasets and outpatient datasets are proposed to be effective on January 1, 2015. The requirement that each record contains a "Principal Diagnosis" are also proposed to be effective on January 1, 2015.

Please let me know if you have any other questions.

Comment 4:

Mr. Won,

On behalf of Kaiser Permanente Northern and Southern Foundation Hospitals, we are in support of the proposed changes outlined in the Notice of Proposed Rulemaking available June 6, 2014.

Moving to a uniform requirement and using national standards will bring efficiencies for reporting but also in the collection process for hospitals.

We look forward to reporting using the new requirements with the proposed effective date of January 1, 2015.

No comments were received that suggested any modification to the original proposal.

Alternatives Determination

The Office has determined that no reasonable alternative considered by the Office or that has otherwise been identified and brought to the attention of the Office:

- Would be more effective in carrying out the purpose for which the action is proposed,
- Would be as effective and less burdensome to affected private persons that he proposed action;

- Would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

No alternatives were proposed or otherwise brought to the Office's attention.

Local Mandate Determination

The proposed regulations do not impose any mandate on local agencies or school districts.