



Office of Statewide Health Planning and Development

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FINAL STATEMENT OF REASONS

CALIFORNIA CODE OF REGULATIONS

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

Sections 97215, 97216, 97217, 97221, 97222, 97223, 97224, 97228 and 97229

Update to Initial Statement of Reasons

No modifications have been made to the proposed regulations.

Local Mandate Determination

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

Incorporation by Reference

The below Format and File Specifications documents have been incorporated by reference. The documents have been incorporated by reference, because they are lengthy and detailed. It is ordinary business practice for facilities to access these “format and file specifications” in separate documents. 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: January 1, 2015

Version 2.9

Revised: January 26, 2015

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

Effective with discharges occurring on and after: January 1, 2017
Version 3.0
Revised: January 30, 2015

3) FORMAT and FILE SPECIFICATIONS for MIRCAl ONLINE TRANSMISSION:
EMERGENCY CARE AND AMBULATORY SURGERY DATA
Effective with encounters occurring on and after: January 1, 2015
Version 1.9
Revised: January 26, 2015

Summary and Response to Comments Received During the Notice Period of July 10, 2015 through August 24, 2015.

During the comment period three comments were received by the Office of Statewide Health Planning and Development (the Office).

COMMENT NO. 1: The Office received a comment from Jesse Lane, Senior Data Consultant with Kaiser Permanente. She recommended adding a 30-character user-defined field to our Format and File specifications, that can be used for any purpose.

Response: The Office disagrees with this suggestion. The addition of a 30-character user-defined field is outside the scope of this regulatory proposal and does not align with the purpose of the Medical Information Reporting for California data collection program.

COMMENT NO. 2: The San Francisco Department of Public Health recommends that the Office collect both birth sex and current gender identity information through a two-part question:

1. What is your gender? [*Multiple-choice with ability to only select one option*]
a) Male, b) Female, c) Trans Male, or d) Trans Female
2. What was your sex at birth? [*Multiple-choice with ability to only select one option*]
a) Male, or b) Female

Response: The Office is not adopting this recommendation. One of the purposes of this regulatory proposal is to align the Sex data element with national standards. National standards do not utilize the two-part question format proposed by the San Francisco Department of Public Health. Aligning with national standards will help licensed facilities report patient data to the Office in a more efficient, less costly, and less burdensome manner. In addition, the data reported will be more reflective of the uniform standards used in the healthcare industry.

COMMENT NO. 3: Kaiser commends the Office's efforts to continue moving forward to national standards. Additionally, Kaiser states that the January 1, 2017, mandated deadline will give ample time for organizations to prepare and be ready for the new reporting requirements.

Response: The Office thanks Kaiser for its support on this regulatory proposal.

Alternatives That Would Lessen Adverse Economic Impact on Small Business

No alternatives were proposed to the Office that would lessen any adverse economic impact on small business.

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.

One alternative was proposed by the San Francisco Department of Public Health (SFDPH). SFDPH proposed that the Office collect birth sex and current gender identity. This alternative would be less effective in carrying out the purpose of this regulatory proposal. One of the purposes of this regulatory proposal is to align the Sex data element with national standards. The alternative proposed by the SFDPH does not align with national standards. Further, it would be more burdensome and less cost-effective for facilities to report in a manner different from national standards.