Successful Delegation
Above and Beyond Regulation and Accreditation

Objectives

- Define Delegation
- Identify Elements of a nationally recognized Delegate Oversight Program
- Review Processes and Tools to Build Successful Delegation Relationships
- Share Best Practice Tips, Tools and Ideas
Defining Delegation

A formal process by which an organization gives another entity the authority to perform certain functions on its behalf. Although an organization may delegate the authority to perform a function, it may not delegate the responsibility for ensuring that the function is performed appropriately.

– NCQA Health Plan Standards, 2011

Defining Delegation

The process by which the organization contracts with or otherwise arranges for another entity to perform functions and to assume responsibilities covered under these standards on behalf of the organization, while the organization retains final authority to provide oversight to the delegate.

– URAC Health Plan Standards, Ver. 6.0, 2009
Defining Delegation

CMS considers delegation a business relationship between the organization and a first-tier entity to perform certain functions that otherwise would be the responsibility of the organization to perform. The organization oversees and is accountable for any functions or responsibilities that are delegated to other entities whether the functions are provided by the first-tier and other downstream entities.

Authority vs. Accountability

Regardless of the definition, the plan is ultimately held responsible
- *A health plan may give a delegate the authority to act on its behalf, but the organization remains accountable.*
Delegate vs. Vendor

Delegate Oversight
- UM, CM, DM
- Claims Payment
- Marketing
- Credentialing
- Behavioral Health Services
- Pharmacy Benefit Management
- Member Enrollment

Vendor Management
- Specialty Pharmacy
- Claims Audit
- Identity Theft Recovery
- Member Transportation Contracts
- Non-traditional Providers

Committee Oversight

- Delegate Oversight Committee
  - Evaluates the quality of care and service provided to BCBST members and practitioners by delegate/vendor organizations through continuous oversight of the delegate/vendors’ performance, program, regular reports, and corrective action/focus improvement plans as applicable
Delegate Oversight Committee Membership

Accountability to the Governing Body

Board of Directors

Chief Executive Officer

Leadership Council

Quality Oversight Committee

Delegate Oversight Committee
Delegate Oversight Organizational Chart

VP of Performance Measurement and Improvement

Director of Quality Management

Special Project Technician

Delegate Oversight Project Manager
Delegate Oversight Project Manager
Delegate Oversight Project Manager
Delegate Oversight Project Manager

Significant Growth in Delegated Services/Activities

- Currently 56 delegated vendors; increase of 92% since 2007
  - Pharmacy Benefit Manager
  - Behavioral Health
  - Case, Disease and/or Utilization Management
  - High Risk OB
  - Operations Call Center
  - Credentialing
  - 24/7 Nurseline
  - Air/Ground Transportation Services
  - Marketing Data/Materials
  - Medical Independent Review
  - High Tech Imaging
  - ID Theft Restoration Vendor
  - Claims Analytics
Delegate Oversight Processes Safeguard Compliance

- Pre-Delegation
  - Request for Proposal Support
  - Facilitation of Contracted Services Language
  - Development of Delegation Contract Language
  - Pre-Delegation Evaluation
  - Support Implementation Activities
Delegate Oversight Processes Safeguard Compliance

- Performance Monitoring
  - Review of Performance Indicators at a minimum of semi-annually
  - Communicate routinely with Delegates
  - Focused Reviews and Corrective Action Plans as warranted

Delegate Oversight Processes Safeguard Compliance

- Annual Evaluation
  - Must mirror contract
  - Desktop vs. Onsite
  - Includes Standards as well as Performance compliance
Tips, Tools and Concepts

- Delegate Oversight templates
  - Delegate Services Agreements
  - Evaluation Roadmaps
  - File Review Worksheets
  - Contract Checklists

Tips, Tools and Concepts

- Delegate Services Agreements
  - Holds Delegate to BCBST business practice, regulation, and accreditation standards
  - Requires cooperation with QM and Delegate Oversight activities
  - Defines the delegated function(s)
  - States responsibilities of Delegate and BCBST
  - Defines reporting of performance indicators/measures
  - Addresses sub-delegation
  - Addresses failure to meet expectations and corrective action
  - Addresses documentation required for annual evaluation
### Tips, Tools and Concepts

#### Indicator Description | Report Schedule | Performance Goal | 1<sup>st</sup> Qtr | 2<sup>nd</sup> Qtr | 3<sup>rd</sup> Qtr | 4<sup>th</sup> Qtr
---|---|---|---|---|---|---
Pre-Cert/Prior Auth Non-urgent | Quarterly | | | | | |
Total number | N/A | | | | | |
Decision Timeliness | 94% - 24 hrs/1 business day of decision | | | | | |
Initial Notification Timeliness | 94% - 24 hrs/1 business day of decision | | | | | |
Confirm Standard Electronic or Written | 94% - 24 hrs/1 business day of decision | | | | | |

Excerpt from UM Performance Indicator Template

### Tips, Tools and Concepts

#### Case Management Functions

<table>
<thead>
<tr>
<th>Case Management Functions</th>
<th>Entity Performing Function</th>
</tr>
</thead>
<tbody>
<tr>
<td>The program content addresses the following: A description of the CM program including a definition of case management, overview, structure, goals and purpose of the program</td>
<td>Delegate</td>
</tr>
<tr>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Identifies members for Case Management through the following sources: Claim or encounter data Hospital or Discharge data Pharmacy data Data collected through the UM processes if applicable</td>
<td>Delegate</td>
</tr>
<tr>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Case Management systems support: Evidence based clinical guidelines or algorithms to conduct assessment and management Automatic documentation of the staff ID, date and time of action on the case action/interaction Automated prompts for follow-up</td>
<td>Delegate</td>
</tr>
<tr>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>
Tips, Tools and Concepts

- Evaluation Roadmap Templates
  - Ensures consistency of delegate evaluation
  - Addresses accreditation, regulatory, contractual and BCBST business practice elements
  - Cites source of the guidelines – NCQA, URAC, Regulation, contract section and/or BCBST policy
  - Provides example reference documents that may be used to support compliance
  - Requires delegate to list reference materials provided
  - Provides reviewer comment section

<table>
<thead>
<tr>
<th>Guideline</th>
<th>Guideline Source</th>
<th>Example Reference Documents</th>
<th>Documents Supplied</th>
<th>Possible Score</th>
<th>Actual Score</th>
<th>Reviewer Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Organizational Structure</td>
<td>URAC Core Version 3.0, Core 01, NCQA 2011 QI 1 - Element A</td>
<td>- Organizational chart&lt;br&gt; - Committee structure&lt;br&gt; - Program structure&lt;br&gt; - Interview and Observation</td>
<td>4</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Staff Qualifications</td>
<td>URAC Core Version 3.0, Core 26</td>
<td>• Job Descriptions&lt;br&gt; • File Review&lt;br&gt; • Policies and Procedures&lt;br&gt; • Attestation</td>
<td>4</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Excerpt from Core Roadmap Template
### Scoring Explanation

<table>
<thead>
<tr>
<th>Scoring</th>
<th>Scoring Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td>Total Compliance: Delegate meets all elements of the requirement.</td>
</tr>
<tr>
<td>3</td>
<td>Substantial Compliance: Delegate meets all primary elements of the requirement, but does not meet one secondary element.</td>
</tr>
<tr>
<td>2</td>
<td>Partial Compliance: Delegate meets all primary elements of the requirement, but does not meet two or more secondary elements.</td>
</tr>
<tr>
<td>1</td>
<td>Minimal Compliance: Delegate has a process or program that relates to the requirement, but does not meet all primary elements.</td>
</tr>
<tr>
<td>0</td>
<td>Non-Compliance: Delegate has no process or program that relates to the primary elements of the requirement.</td>
</tr>
<tr>
<td>N/A</td>
<td>Not Applicable: Requirement or element does not apply to the delegate.</td>
</tr>
</tbody>
</table>

**BCBST Scoring**

- **90% - 100%** Full Compliance
- **80% - 89%** Substantial Compliance
- **70% - 79%** Minimal Compliance
- **>70%** Non-Compliant

**File Review Worksheets**

- Ensures consistency of delegate evaluation
- Addresses accreditation, regulatory, contractual and BCBST business practice elements
- Cites source of the guidelines – NCQA, URAC, Regulation, contract section and/or BCBST policy
- Reflects accreditation requirements
- Reflects contractual requirements
### Tips, Tools and Concepts

<table>
<thead>
<tr>
<th>Case Number</th>
<th>Case Status</th>
<th>NCQA QI 7 - D, E</th>
<th>URAC CM 14 NCQA QI 7 - D</th>
<th>URAC CM 17 NCQA QI 7 - H</th>
<th>BCBST Practice Contract Section DSA I - 20</th>
<th>URAC CM 22 BCBST Practice Contract Section H - 4</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Evaluation of Benefits</td>
<td>Member Rights provided to member</td>
<td>Criteria for Opening Case</td>
<td>SF 12 Survey – Measuring Effectiveness</td>
<td>SSI Eligibility</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Timeframe Met (30 days)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Excerpt from CM Case File Review Example

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### Tips, Tools and Concepts

<table>
<thead>
<tr>
<th>Document Requirement</th>
<th>Met in Section/Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agreement to meet NCQA/URAC applicable standards</td>
<td></td>
</tr>
<tr>
<td>Agreement to meet CMS rules, regulations and letter rulings</td>
<td></td>
</tr>
<tr>
<td>Agreement to participate in onsite or desktop assessment at a minimum of annually</td>
<td></td>
</tr>
<tr>
<td>Agreement to provide BCBST access to medical records and other materials as needed to assess contract compliance</td>
<td></td>
</tr>
<tr>
<td>Require the vendor/provider to submit performance monitoring reports no less than semiannually to BCBST regarding the performance of the delegated responsibilities</td>
<td></td>
</tr>
<tr>
<td>Require cooperation in development, implementation and completion of corrective action plan as indicated</td>
<td></td>
</tr>
<tr>
<td>Require the initial and ongoing monitoring of employees against the Excluded Parties Listing</td>
<td></td>
</tr>
<tr>
<td>Specify that prior to sub-delegating any services/activities/functions, the vendor/provider must submit a written request to BCBST for approval</td>
<td></td>
</tr>
</tbody>
</table>

Example items that may be included on a Delegate Oversight Checklist

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**Tips, Tools and Concepts**

<table>
<thead>
<tr>
<th>Guideline or Standard</th>
<th>Finding or Opportunity for Improvement</th>
<th>Planned Corrective Action</th>
<th>Responsible Party</th>
<th>Target Completion date</th>
<th>Actual completion Date</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

Sample Corrective Action Plan Template

Share Time

What are your best practices?
Have we met our Objectives?

- Define Delegation
- Identify Elements of a nationally recognized Delegate Oversight Program
- Review Processes and Tools to Build Successful Delegation Relationships
- Share Best Practice Tips, Tools and Ideas

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