General Comments on 4th Quarter 2015 Data

The following general comments about the data for this quarter are made by THCIC and apply to all data released for this quarter.

. Data are administrative data, collected for billing purposes, not clinical data.

Data are submitted in a standard government format, the 837 format used for submitting billing data to payers. State specifications require the submission of additional data elements. These data elements include race and ethnicity. Because these data elements are not sent to payers and may not be part of the facility's standard data collection process, there may be an increase in the error rate for these elements.

• Facilities are required to submit the patient's race and ethnicity following categories used by the U. S. Bureau of the Census. This information may be collected subjectively and may not be accurate.

Facilities are required to submit data within 60 days after the close of a calendar quarter (facility data submission vendor deadlines may be sooner). Depending on facilities' collection and billing cycles, not all services may have been billed or reported. Therefore, data for each quarter may not be complete. This can affect the accuracy of source of payment data, particularly self-pay and charity categories, where patients may later qualify for Medicaid or other payment sources.

. Conclusions drawn from the data are subject to errors caused by the inability of the facility to communicate complete data due to reporting form constraints, subjectivity in the assignment of codes, system mapping, and normal clerical error. The data are submitted by facilities as their best effort to meet statutory requirements.

PROVIDER: Baptist St Anthonys Hospital THCIC ID: 001000 QUARTER: 4 YEAR: 2015

Certified With Comments

I elect to certify this data is accurate to the best of my knowledge as of this date of certification 5/6/16

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PROVIDER: Matagorda Regional Medical Center THCIC ID: 006000 QUARTER: 4 YEAR: 2015

Certified With Comments

The data included in this file is administrative, not clinical research data. Administrative data may not accurately represent the clinical details of a patient visit. This data should be cautiously used to evaluate health care quality and compare outcomes.

PROVIDER: Grace Medical Center THCIC ID: 013001

Outpatient Facility Comments, 4Q2015.txt

QUARTER: 4 YEAR: 2015

Certified With Comments

Please disregard the ethnicity erros on all claims for 4th Q 2015. We had a vendor update and was not able to recreate a correct ethnicity code for claims .

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PROVIDER: Jackson County Hospital THCIC ID: 017000 QUARTER: 4 YEAR: 2015

Certified With Comments

Please note most of the errors/invalid data in this reporting period is due to SSN's registered as 000-00-0000 instead of System 13's required 999-99-9999 format.

\_\_\_\_\_ PROVIDER: Baylor Scott & White Medical Center-Garland THCIC ID: 027000 QUARTER: 4 YEAR: 2015

Certified With Comments

Due to the sheer volume of OP data, we have limited resources as a hospital to analyze the data. Regarding the mandate to communicate the Certification reports to physicians The State does not offer a secure mechanism for us to communicate other than the hard copy reports. At this time, we as a hospital are moving to limit or eliminate paper distribution and we do not have an internal system to communicate to all physicians feasibly.

Quality Trending of data over a few years is important to define outcome and quality. A small sampling of data (i.e. one year) does not explain outcome.

We recommend the Patient communicate with the Hospital and the Physician regarding data. Patient and physician preference contributes to the care rendered to the patient and the data does not always reflect this.

Patients and physicians consider many factors when making health care decisions that are not available in administrative data. These include a patients preference for life-sustaining treatments, functional status, and other factors.

We support the Patient, Provider, and Payer and empowered, educated decision-making. Quality improvement is not new; it is an on-going commitment.

\_\_\_\_\_ PROVIDER: Good Shepherd Medical Center THCIC ID: 029000 QUARTER: 4 YEAR: 2015

Certified With Comments

This data is submitted in an effort to meet statutory requirements. Conclusions drawn could be erroneous due to communication difficulties in reporting complete Page 2

Outpatient Facility Comments, 4Q2015.txt data caused by reporting constraints, subjectivity in assignment of codes, various system mapping and normal clerical error. Data submission deadlines prevent inclusion of all applicable cases therefore this represents administrative claims data at the time of preset deadlines. Diagnostic and procedural data may be incomplete due to data field limitations. Data should be cautiously used to evaluate health care quality and compare outcomes.

PROVIDER: Baylor Scott & White Medical Center Carrollton THCIC ID: 042000 QUARTER: 4 YEAR: 2015 Certified With Comments

Baylor Medical Center Carrollton OUTPATIENT DATA THCIC ID: 042000 QUARTER: 4 YEAR: 2015

CERTIFIED WITH COMMENTS

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PROVIDER: Texas Health Huguley Hospital THCIC ID: 047000 QUARTER: 4 YEAR: 2015

Certified With Comments

The following comments reflect concerns, errors, or limitations of discharge data for THCIC mandatory reporting requirements as of September 1, 2016. If any errors are discovered in our data after this point, we will be unable to communicate these due to THCIC. This data is administrative data, which hospitals collect for billing purposes, and not clinical data, from which you can make judgments about patient care.

Submission Timing

The State requires us to submit a snapshot of billed claims, extracted from our database approximately 20 days following the close of the calendar year quarter. Any discharged patient encounters not billed by this cut-off date will not be included in the quarterly submission file sent in.

Diagnosis and Procedures

The data submitted matches the state's reporting requirements but may be incomplete due to a limitation on the number of diagnoses and procedures the state allows us to include for each patient. In other words, the state's data file may not fully represent all diagnoses treated by the hospital or all procedures performed which can alter the true picture of a patient's hospitalization, sometimes significantly.

Patient diagnoses and procedures for a particular hospital stay are coded by the hospital using ICD-10-CM effective 10-1-2015 and CPT. This is mandated by the federal government and all hospitals must comply. The codes are assigned based on documentation in the patient's chart and are used by hospitals for billing purposes. The hospital can code as many as 25 diagnoses and 25 procedures for each patient record. One limitation of using the ICD-10-CM and CPT is that there does not exist a code for every possible diagnosis and procedure due to the continued evolution of medicine; new codes are added yearly as coding manuals are updated.

There is no mechanism provided in the reporting process to factor in DNR (Do Not Resuscitate) patients. Any mortalities occurring to a DNR patient are not recognized separately; therefore mortality ratios may be accurate for reporting standards but overstated.

Given the current certification software, due to hospital volumes, it is not feasible to perform encounter level audits and edits. To meet the state's mandates to submit hospital Outpatient visits with specific procedures, Texas Health Huguley underwent a major program conversion to the HCFA 837 EDI electronic claim format.

The quarterly data to the best of our knowledge is accurate and complete given the above.

PROVIDER: San Angelo Community Medical Center THCIC ID: 056000 QUARTER: 4 YEAR: 2015

Certified With Comments

Have discussed the issue with admission capture of race and ethinicity with Patient Accounts Director. Will work with admission clerks to make sure this information is captured.

PROVIDER: Brownwood Regional Medical Center THCIC ID: 058000 QUARTER: 4 YEAR: 2015

Certified With Comments

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Known facility data system issue with payer source codes. Resolution is in progress with CHS corporate support. Patient Access staff educated 5/26/16 Page 4

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Outpatient Facility Comments, 4Q2015.txt regarding appropriate race and ethnicity. Missing practitioner NPI numbers being researched and corrected.

\_\_\_\_\_ PROVIDER: Brownfield Regional Medical Center THCIC ID: 078000 QUARTER: 4 YEAR: 2015 Certified With Comments OUT PATIENT IS GOOD PROVIDER: Graham Regional Medical Center THCIC ID: 094000 QUARTER: 4 YEAR: 2015 Certified With Comments C12-Certification Error Type list shows one error of E-608 Missing Principle Diagnosis. Unable to determine PCN or MRN or Name. PROVIDER: TMC Bonham Hospital THCIC ID: 106001 QUARTER: 4 YEAR: 2015 Certified With Comments 2740 claims with blank on Patient Country. Our electronic health record has no means to enter patient country. 2741 claims with second payer src code blank or zero. This information is not available. If HCPCs procedure codes are blank, there is no associated HCPCs with the charges. PROVIDER: Facial Plastic & Cosmetic Surgical Center THCIC ID: 111001 QUARTER: 4 YEAR: 2015 Certified With Comments I noticd that the birth year was incorrect on one entry. Is this something that must be changed? The name, address, SSN is correct. Please advise. PROVIDER: CHI St Lukes Health Baylor College of Medicine Medical Center THCIC ID: 118000 QUARTER: 4 YEAR: 2015 Certified With Comments The data reports for Quarter 4, 2015 do not accurately reflect patient volume or severity.

Patient Volume

Data reflects administrative claims data (Uniform Billing data elements) that are a snapshot of claims that have been billed prior to the reporting deadline. If the encounter has not yet been billed, data will not be reflected in this quarter.

Severity

Not all clinically significant conditions, such as the hearts ejection fraction, can be captured and reflected in the various billing data elements including the ICD-9-CM diagnosis coding system. As a result, the true clinical picture of the patient population cannot be adequately demonstrated using admissions and billing data.

Payer Source A payer source mapping discrepancy has been identified. The HIS vendor is working towards a resolution.

\_\_\_\_\_ PROVIDER: South Texas Ambulatory Surgery Center THCIC ID: 130060 QUARTER: 4 YEAR: 2015

Certified With Comments

Any errors may be due to patient's non-disclosure of their social security number.

PROVIDER: Memorial Hermann Endoscopy Center North Loop THCIC ID: 130074 QUARTER: 4 YEAR: 2015 Certified With Comments

MISSING PRINCIPLE DIAGNOSIS

\_\_\_\_\_ PROVIDER: University Medical Center THCIC ID: 145000 QUARTER: 4 YEAR: 2015

Certified With Comments

This data represents accurate information at the time of submission. Subsequent changes may continue to occur that will not be reflected in this published dataset.

\_\_\_\_\_\_ PROVIDER: JPS Surgical Center-Arlington THCIC ID: 153300 QUARTER: 4 YEAR: 2015

Outpatient Facility Comments, 4Q2015.txt Certified With Comments

John Peter Smith Hospital (JPSH) is operated by JPS Health Network under the auspices of the Tarrant County Hospital District. The JPS Health Network is accredited by the Joint Commission. In addition, JPSH holds Joint Commission accreditation as a hospital.

JPSH is the only Texas Department of Health certified Level I Trauma Center in Tarrant County and includes the only psychiatric emergency center in the county. The hospital's services include intensive care for adults and newborns, an AIDS treatment center, a skilled nursing unit, a full range of obstetrical and gynecological services, adult inpatient care and an inpatient mental health treatment facility.

JPSH is a major teaching hospital offering, or providing through co-operative arrangements, postdoctoral training in orthopedics, obstetrics and gynecology, psychiatry, surgery, oral and maxillofacial surgery, radiology, sports medicine, podiatry and pharmacy. The family medicine residency is the largest hospital-based family medicine residency program in the nation.

In addition to JPSH, the JPS Health Network operates community health centers located in medically underserved areas of Tarrant County; school-based health clinics; outpatient programs for pregnant women, behavioral health and cancer patients; and a wide range of wellness education programs.

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PROVIDER: Texas Health Harris Methodist HEB THCIC ID: 182000 QUARTER: 4 YEAR: 2015

Certified With Comments

Data Content This data is administrative data, which hospitals collect for billing purposes. Administrative data may not accurately represent the clinical details of an encounter.

The state requires us to submit outpatient claims for patients that receive outpatient surgical or radiological services, by quarter year, gathered from a form called an UB92, in a standard government format called HCFA 837 EDI electronic claim format. Then the state specifications require additional data elements to be included over and above that. Adding those additional data places programming burdens on the hospital since it is over and above the actual hospital billing process. Errors can occur due to this additional programming, but the public should not conclude that billing data sent to our payers is inaccurate. These errors have been corrected to the best of our knowledge.

If a medical record is unavailable for coding the encounter is not billed and is not included in the data submission. This represents a rare event that is less than 1% of the encounter volume.

Diagnosis and Procedures

Patient diagnoses and procedures Patient diagnoses and procedures for a particular outpatient hospital stay are coded by the hospital using a universal standard called the International Classification of Disease (ICD 9 CM) and Current Procedural Terminology Codes (CPT Codes). This is mandated by the federal government. The hospital complies with the guidelines for assigning these diagnosis codes; however, this is often driven by physician's subjective criteria for defining a diagnosis. For example, while one physician may diagnose a patient with anemia when the patient's blood hemoglobin level falls below 9.5, another physician may not

Outpatient Facility Comments, 4Q2015.txt diagnose the patient with anemia until their blood hemoglobin level is below 9.0. In both situations, a diagnosis of anemia is correctly assigned, but the criteria used by the physician to determine that diagnosis was different. An apples to apples comparison cannot be made, which makes it difficult to obtain an accurate comparison of hospital or physician performance.

The codes also do not distinguish between conditions present at the time of the patient's admission to the hospital and those occurring during hospitalization. For example, if a code indicating an infection is made, it is not always possible to determine if the patient had an infection prior to admission, or developed an infection during their hospitalization. This makes it difficult to obtain accurate information regarding things such as complication rates.

The data submitted matches the state's reporting requirements but may be incomplete due to a limitation on the number of diagnoses and procedures the state allows us to include for each patient. In other words, the state's data file may not fully represent all diagnoses treated by the hospital or all procedures performed, which can alter the true picture of a patient's hospitalization, sometimes significantly.

The codes are assigned based on documentation in the patient's chart and are used by hospitals for billing purposes. The hospital can code up to 99 diagnoses and 99 procedures for each patient record. The state is requiring us to submit ICD-9-CM / CPT data on each outpatient receiving surgical or radiological services, but has limited the number of diagnoses and procedures to the first 25 diagnoses codes and the first 25 procedure codes. As a result, the data sent by us does meet state requirements but cannot reflect all the codes an individual patient's record may have been assigned.

# Length of Stay

The length of stay data element contained in the states certification file is only three characters long. Thus any patients discharged with a length of stay greater than 999 days will not be accurately stored within the certification database. It is rare that patients stay longer than 999 days, therefore, it is not anticipated that this limitation will affect this data. Race/Ethnicity

As of the December 7, 2001, the THCIC Board indicated that they would be creating guidelines for use by hospitals. These guidelines will provide better clarity for the accurate collection of this data. Hospitals do not routinely collect race and ethnicity as part of the admission process, that this has been added to meet the THCIC requirement. Our admissions staff indicates that many patients are very sensitive about providing race and ethnicity information. Therefore, depending on the circumstances of the patient's admission, race and ethnicity data may be subjectively collected. Therefore, the race and ethnicity data may not provide an accurate representation of the patient's admission. data may not provide an accurate representation of the patient population for a facility.

# Standard/Non-Standard Source of Payment

The standard and non-standard source of payment codes are an example of data required by the state that is not contained within the standard UB92 billing In order to meet this requirement, each payer identifier must be record. categorized into the appropriate standard and non-standard source of payment value. These values might not accurately reflect the hospital payer information, because those payers identified contractually as both HMO, and PPO are categorized as Commercial PPO. Thus any true managed care comparisons by contract type (HMO vs. PPO) may result in inaccurate analysis.

#### Cost/ Revenue Codes

The state requires that hospitals submit revenue information including charges. It is important to note that charges are not equal to actual payments received by the hospital or hospital cost for performing the service. Typically actual payments are much less than charges due to managed care-negotiated discounts and denial of payment by insurance companies. Charges also do not reflect the actual Outpatient Facility Comments, 4Q2015.txt cost to deliver the care that each patient needs.

PROVIDER: Texas Health Harris Methodist Hospital-Fort Worth THCIC ID: 235000 QUARTER: 4 YEAR: 2015

Certified With Comments

Data Content This data is administrative data, which hospitals collect for billing purposes. Administrative data may not accurately represent the clinical details of an encounter.

The state requires us to submit outpatient claims for patients that receive outpatient surgical or radiological services, by quarter year, gathered from a form called an UB92, in a standard government format called HCFA 837 EDI electronic claim format. Then the state specifications require additional data elements to be included over and above that. Adding those additional data places programming burdens on the hospital since it is over and above the actual hospital billing process. Errors can occur due to this additional programming, but the public should not conclude that billing data sent to our payers is inaccurate. These errors have been corrected to the best of our knowledge.

If a medical record is unavailable for coding the encounter is not billed and is not included in the data submission. This represents a rare event that is less than 1% of the encounter volume.

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The data submitted matches the state's reporting requirements but may be incomplete due to a limitation on the number of diagnoses and procedures the state allows us to include for each patient. In other words, the state's data file may not fully represent all diagnoses treated by the hospital or all procedures performed, which can alter the true picture of a patient's hospitalization, sometimes significantly.

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# Outpatient Facility Comments, 402015.txt

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PROVIDER: Wise Health System THCIC ID: 254001 QUARTER: 4 YEAR: 2015

Certified With Comments

The data for 4Q2015 is being certified with comment. All reported data is accurate and correct at the specific point in time that the data files are generated. Information is subject to change after files are generated and submitted to THCIC; any changes would be information collected or updated during the normal course of business.

PROVIDER: Texas Health Harris Methodist Hospital-Stephenville THCIC ID: 256000 QUARTER: 4 YEAR: 2015 Outpatient Facility Comments, 4Q2015.txt

Certified With Comments

Data Content This data is administrative data, which hospitals collect for billing purposes. Administrative data may not accurately represent the clinical details of an encounter.

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\_\_\_\_\_\_ PROVIDER: University Medical Center of El Paso THCIC ID: 263000 QUARTER: 4 YEAR: 2015

Certified With Comments

In this database only one primary physician is allowed. This represents the physician at discharge in this institution. At an academic medical center such as University Medical Center of El Paso, patients are cared for by teams of physicians who rotate at varying intervals. Therefore, many patients, particularly long term patients may actually be managed by several different teams. The practice of attributing patient outcomes in the database to a single physician may result in inaccurate information.

Through performance improvement process, we review the data and strive to make changes to result in improvement.

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PROVIDER: Baylor Scott & White Medical Center Waxahachie THCIC ID: 285000 QUARTER: 4 YEAR: 2015

Certified With Comments

Due to the sheer volume of OP data, we have limited resources as a hospital to analyze the data. Regarding the mandate to communicate the Certification Page 12

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Outpatient Facility Comments, 4Q2015.txt reports to physicians The State does not offer a secure mechanism for us to communicate other than the hard copy reports. At this time, we as a hospital are moving to limit or eliminate paper distribution and we do not have an internal system to communicate to all physicians feasibly.

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PROVIDER: Christus Mother Frances Hospital Tyler THCIC ID: 286000 QUARTER: 4 YEAR: 2015

Certified With Comments

Approximately 1.6% of outpatient record count reflects late additions of 3Q data that was previously inadvertently omitted due to software error.

PROVIDER: Wilson N Jones Regional Medical Center THCIC ID: 297000 QUARTER: 4 YEAR: 2015

Certified With Comments

Continue to work with vendor to reduce errors.

PROVIDER: Baylor Scott & White Medical Center-Irving THCIC ID: 300000 QUARTER: 4 YEAR: 2015

Certified With Comments

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Outpatient Facility Comments, 4Q2015.txt regarding data. Patient and physician preference contributes to the care rendered to the patient and the data does not always reflect this. Patients and physicians consider many factors when making health care decisions that are not available in administrative data. These include a patients preference for life-sustaining treatments, functional status, and other factors. We support the Patient, Provider, and Payer and empowered, educated decision-making. Quality improvement is not new; it is an on-going commitment. PROVIDER: Texas Health Presbyterian Hospital-Kaufman THCIC ID: 303000 QUARTER: 4 YEAR: 2015 Certified With Comments THCIC ID: тн303000 2015 Quarter 4 Outpatient OUARTER: Texas Health Kaufman CERTIFIED WITH COMMENTS Data Content This data is administrative data, which hospitals collect for billing purposes. Administrative data may not accurately represent the clinical details of an encounter. The state requires us to submit outpatient claims for patients that receive outpatient surgical or radiological services, by quarter year, gathered from a form called an UB92, in a standārd government format called HCFA 837 EDI electronic claim format. Then the state specifications require additional data elements to be included over and above that. Adding those additional data places programming burdens on the hospital since it is over and above the actual hospital billing process. Errors can occur due to this additional programming, but the public should not conclude that billing data sent to our payers is inaccurate. These errors have been corrected to the best of our knowledge. If a medical record is unavailable for coding the encounter is not billed and is not included in the data submission. This represents a rare event that is less than 1% of the encounter volume. Diagnosis and Procedures Patient diagnoses and procedures for a particular outpatient hospital stay are coded by the hospital using a universal standard called the International Classification of Disease (ICD-9-CM) and Current Procedural Terminology Codes (CPT Codes). This is mandated by the federal government. The hospital complies with the guidelines for assigning these diagnosis codes; however, this is often driven by physician's subjective criteria for defining a diagnosis. For example, while one physician Page 14

# Outpatient Facility Comments, 4Q2015.txt

may diagnose a patient with anemia when the patient's blood hemoglobin level falls below 9.5, another physician may not diagnose the patient with anemia until their blood hemoglobin level is below 9.0. In both situations, a diagnosis of anemia is correctly assigned, but the criteria used by the physician to determine that diagnosis was different. An apples to apples comparison cannot be made, which makes it difficult to obtain an accurate comparison of hospital or physician performance. The codes also do not distinguish between conditions present at the time of the patient's admission to the hospital and those occurring during hospitalization. For example, if a code indicating an infection is made, it is not always possible to determine if the patient had an infection prior to admission, or developed an infection during their hospitalization. This makes it difficult to obtain accurate information regarding things such as complication rates. The data submitted matches the state's reporting requirements but may be incomplete due to a limitation on the number of diagnoses and procedures the state allows us to include for each patient. In other words, the state's data file may not fully represent all diagnoses treated by the hospital or all procedures performed, which can alter the true picture of a patient's hospitalization, sometimes significantly. The codes are assigned based on documentation in the patient's chart and are used by hospitals for billing purposes. The hospital can code up to 99 diagnoses and 99 procedures for each patient record. The state is requiring us to submit ICD-9-CM / CPT data on each outpatient receiving surgical or radiological services, but has limited the number of diagnoses and procedures to the first 25 diagnoses codes and the first 25 procedure codes. As a result, the data sent by us does meet state requirements but cannot reflect all the codes an individual patient's record may have been assigned. Length of Stay The length of stay data element contained in the states certification file is only three characters long. Thus any patients discharged with a length of stay greater than 999 days will not be accurately stored within the certification database. It is rare that patients stay longer than 999 days, therefore, it is not anticipated that this limitation will affect this data. Race/Ethnicity As of the December 7, 2001, the THCIC Board indicated that they would be creating guidelines for use by hospitals. These guidelines will provide better clarity for the accurate collection of this data. Hospitals do not routinely collect race and ethnicity as part of the admission process, that

Outpatient Facility Comments, 4Q2015.txt this has been added to meet the THCIC requirement. Our admissions staff indicates that many patients are very sensitive about providing race 07/18/16 and ethnicity information. Therefore, depending on the circumstances of the patient's admission, race and ethnicity data may be subjectively collected. Therefore, the race and ethnicity data may not provide an accurate representation of the patient population for a facility. Standard/Non-Standard Source of Payment The standard and non-standard source of payment codes are an example of data required by the state that is not contained within the standard UB92 billing record. In order to meet this requirement. each payer identifier must be categorized into the appropriate standard and non-standard source of payment value. These values might not accurately reflect the hospital payer information, because those payers identified contractually as both HMO, and PPO are categorized as Commercial PPO. Thus any true managed care comparisons by contract type (HMO vs. PPO) may result in inaccurate analysis. Cost/ Revenue Codes The state requires that hospitals submit revenue information including charges. It is important to note that charges are not equal to actual payments received by the hospital or hospital cost for performing the service. Typically actual payments are much less than charges due to managed care-negotiated discounts and denial of payment by insurance companies. Charges also do not reflect the actual cost to deliver the care that each patient needs. \_\_\_\_\_ PROVIDER: Dallas Regional Medical Center THCIC ID: 315003 QUARTER: 4 YEAR: 2015 Certified With Comments DRMC 2015 4th Quarter Outpatient \_\_\_\_\_ PROVIDER: Texas Health Harris Methodist Hospital Cleburne THCIC ID: 323000 QUARTER: 4 YEAR: 2015 Certified With Comments THCIC ID: тн323000

Outpatient Facility Comments, 4Q2015.txt QUARTER: 2015 Quarter 4 Outpatient Texas Health Cleburne CERTIFIED WITH COMMENTS Data Content This data is administrative data, which hospitals collect for billing purposes. Administrative data may not accurately represent the clinical details of an encounter. The state requires us to submit outpatient claims for patients that receive outpatient surgical or radiological services, by quarter year, gathered from a form called an UB92, in a standard government format called HCFA 837 EDI electronic claim format. Then the state specifications require additional data elements to be included over and above that. Adding those additional data places programming burdens on the hospital since it is over and above the actual hospital billing process. Errors can occur due to this additional programming, but the public should not conclude that billing data sent to our payers is inaccurate. These errors have been corrected to the best of our knowledge. If a medical record is unavailable for coding the encounter is not billed and is not included in the data submission. This represents a rare event that is less than 1% of the encounter volume. Diagnosis and Procedures Patient diagnoses and procedures for a particular outpatient hospital stay are coded by the hospital using a universal standard called the International Classification of Disease (ICD-9-CM) and Current Procedural Terminology Codes (CPT Codes). This is mandated by the federal government. The hospital complies with the guidelines for assigning these diagnosis codes; however, this is often driven by physician' subjective criteria for defining a diagnosis. For example, while one physician may diagnose a patient with anemia when the patient's blood hemoglobin level falls below 9.5, another physician may not diagnose the patient with anemia until their blood hemoglobin level is below 9.0. In both situations, a diagnosis of anemia is correctly assigned, but the criteria used by the physician to determine that diagnosis was different. An apples to apples comparison cannot be made, which makes it difficult to obtain an accurate comparison of hospital or physician performance. The codes also do not distinguish between conditions present at the time of the patient's admission to the hospital and those occurring during hospitalization. For example, if a code indicating an infection is made, it is not always possible to determine if the patient had an infection prior to admission, or developed an infection during their hospitalization. This makes it difficult to obtain accurate information regarding things such as complication rates.

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PROVIDER: San Antonio Digestive Disease Endoscopy Center THCIC ID: 329000 QUARTER: 4 YEAR: 2015 Certified with Comments Need Certification for 4 guarter 2015

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PROVIDER: Baylor University Medical Center THCIC ID: 331000 QUARTER: 4 YEAR: 2015

Certified With Comments

Baylor Medical Center at BUMC OUTPATIENT DATA THCIC ID: 331000 QUARTER: 4 YEAR: 2015

CERTIFIED WITH COMMENTS

Due to the sheer volume of OP data, we have limited resources as a hospital to analyze the data. Regarding the mandate to communicate the Certification reports to physicians The State does not offer a secure mechanism for us to communicate other than the hard copy reports. At this time, we as a hospital are moving to limit or eliminate paper distribution and we do not have an internal system to communicate to all physicians feasibly.

Quality Trending of data over a few years is important to define outcome and quality. A small sampling of data (i.e. one year) does not explain outcome.

We recommend the Patient communicate with the Hospital and the Physician regarding data. Patient and physician preference contributes to the care rendered to the patient and the data does not always reflect this.

Patients and physicians consider many factors when making health care decisions Page 19 Outpatient Facility Comments, 4Q2015.txt that are not available in administrative data. These include a patients preference for life-sustaining treatments, functional status, and other factors.

We support the Patient, Provider, and Payer and empowered, educated decision-making. Quality improvement is not new; it is an on-going commitment.

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PROVIDER: Cook Childrens Medical Center THCIC ID: 332000 QUARTER: 4 YEAR: 2015

Certified With Comments

Cook Children's Medical Center has submitted and certified 4th QUARTER 2015 inpatient, outpatient surgery and outpatient radiology encounters to the Texas Health Care Information Council with the following possible data concerns based on the required submission method.

Since our data was submitted to the State we have uncovered medical coding errors regarding the following patient conditions in 2005 and 2010 discharges:

Post-operative infections Accidental puncture and lacerations Post-operative wound dehiscence Post-operative hemorrhage and hematoma

Comparative complication reports reflecting the above conditions could misstate the true conditions at Cook Children's Medical Center for the 4th QUARTER OF 2015.

Patient charges that were accrued before admit or after discharge were systematically excluded from the database. This can happen when a patient is pre-admitted and incurs charges to their encounter before their admit date or charges are discovered and added to the patient encounter after they are discharged. Therefore, the charges for many patient encounters are under reported.

The data structure allowed by THCIC erroneously assigns surgeons to surgical procedures they did not perform. The data structure provided by THCIC allows for one attending and one operating physician assignment. However, patients frequently undergo multiple surgeries where different physicians perform multiple procedures. Assigning all of those procedures to a single 'operating physician' will frequently attribute surgeries to the wrong physician. THCIC chooses to only assign one surgeon to a patient encounter, not to each procedure.

Furthermore, the data structure established by THCIC allows for a limited number of diagnoses and procedures. Patients with more than the limit for diagnoses or procedures will be missing information from the database. This is especially true in complex cases where a patient has multiple major illnesses and multiple surgeries over an extended stay.

PROVIDER: University Medical Center-Brackenridge THCIC ID: 335000 QUARTER: 4 YEAR: 2015 Outpatient Facility Comments, 4Q2015.txt Certified With Comments

As the public teaching hospital in Austin and Travis County, University Medical Center Brackenridge (UMCB) serves patients who are often unable to access primary care. It is more likely that these patients will present in the later more complex stage of their disease.

UMCB has a perinatal program that serves a population that includes mothers with late or no prenatal care. It is also a regional referral center, receiving patient transfers from hospitals not able to serve a complex mix of patients. Treatment of these very complex, seriously ill patients increases the hospital's cost of care, length of stay and mortality rates.

As the Regional Trauma Center, UMCB serves severely injured patients. Lengths of stay and mortality rates are most appropriately compared to other trauma centers.

All physician license numbers and names have been validated with the Physician and the Texas State Board of Medical Examiner website as accurate but some remain unidentified in the THCIC Practitioner Reference Files.

These data are submitted by the hospital as their best effort to meet statutory requirements.

PROVIDER: Medical Arts Hospital THCIC ID: 341000 QUARTER: 4 YEAR: 2015

Elected Not to Certify

Due to the sheer volume of the data, we have limited resources as a hospital to analyze the data with 100% accuracy. We elect not to certify.

PROVIDER: Baylor Scott & White All Saints Medical Center-Fort Worth THCIC ID: 363000 QUARTER: 4 YEAR: 2015 Certified With Comments

Baylor Medical Center at ASFW THCIC ID: 363000 QUARTER: 4 YEAR: 2015

CERTIFIED WITH COMMENTS

Due to the sheer volume of OP data, we have limited resources as a hospital to analyze the data. Regarding the mandate to communicate the Certification reports to physicians The State does not offer a secure mechanism for us to communicate other than the hard copy reports. At this time, we as a hospital are moving to limit or eliminate paper distribution and we do not have an internal system to communicate to all physicians feasibly.

Quality Trending of data over a few years is important to define outcome and quality. A small sampling of data (i.e. one year) does not explain outcome.

Outpatient Facility Comments, 4Q2015.txt We recommend the Patient communicate with the Hospital and the Physician regarding data. Patient and physician preference contributes to the care rendered to the patient and the data does not always reflect this. Patients and physicians consider many factors when making health care decisions that are not available in administrative data. These include a patients preference for life-sustaining treatments, functional status, and other factors. We support the Patient, Provider, and Payer and empowered, educated decision-making. Quality improvement is not new; it is an on-going commitment. PROVIDER: Muenster Memorial Hospital

THCIC ID: 365000 QUARTER: 4 YEAR: 2015 Certified With Comments

Recertification submitted

PROVIDER: Victoria Surgery Center THCIC ID: 396003 QUARTER: 4 YEAR: 2015

Certified With Comments

All data appears to be correct.

PROVIDER: John Peter Smith Hospital THCIC ID: 409000 QUARTER: 4 YEAR: 2015

Certified With Comments

John Peter Smith Hospital (JPSH) is operated by JPS Health Network under the auspices of the Tarrant County Hospital District. The JPS Health Network is accredited by the Joint Commission. In addition, JPSH holds Joint Commission accreditation as a hospital.

JPSH is the only Texas Department of Health certified Level I Trauma Center in Tarrant County and includes the only psychiatric emergency center in the county. The hospital's services include intensive care for adults and newborns, an AIDS treatment center, a skilled nursing unit, a full range of obstetrical and gynecological services, adult inpatient care and an inpatient mental health treatment facility.

JPSH is a major teaching hospital offering, or providing through co-operative arrangements, postdoctoral training in orthopedics, obstetrics and gynecology, psychiatry, surgery, oral and maxillofacial surgery, radiology, sports medicine, podiatry and pharmacy. The family medicine residency is the largest hospital-based family medicine residency program in the nation.

## Outpatient Facility Comments, 4Q2015.txt

In addition to JPSH, the JPS Health Network operates community health centers located in medically underserved areas of Tarrant County; school-based health clinics; outpatient programs for pregnant women, behavioral health and cancer patients; and a wide range of wellness education programs.

PROVIDER: Texas Health Arlington Memorial Hospital THCIC ID: 422000 QUARTER: 4 YEAR: 2015 Certified With Comments THCIC ID: тн422000 OUARTER: 2015 Quarter 4 Outpatient Texas Health Arlington Memorial Hospital CERTIFIED WITH COMMENTS Data Content This data is administrative data, which hospitals collect for billing purposes. Administrative data may not accurately represent the clinical details of an encounter. The state requires us to submit outpatient claims for patients that receive outpatient surgical or radiological services, by quarter year, gathered from a form called an UB92, in a standard government format called HCFA 837 EDI electronic claim format. Then the state specifications require additional data elements to be included over and above that. Adding those additional data places programming burdens on the hospital since it is over and above the actual hospital billing process. Errors can occur due to this additional programming, but the public should not conclude that billing data sent to our payers is inaccurate. These errors have been corrected to the best of our knowledge. If a medical record is unavailable for coding the encounter is not billed and is not included in the data submission. This represents a rare event that is less than 1% of the encounter volume. Diagnosis and Procedures Patient diagnoses and procedures for a particular outpatient hospital stay are coded by the hospital using a universal standard called the International Classification of Disease (ICD-9-CM) and Current Procedural Terminology Codes (CPT Codes). This is mandated by the federal government. The hospital complies with the guidelines for assigning these diagnosis codes; however, this is often driven by physician's subjective criteria for defining a diagnosis. For example, while one physician may diagnose a patient with anemia when the patient's blood hemoglobin level falls below 9.5, another physician may not diagnose the patient with anemia until their blood hemoglobin level is below 9.0. In both

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This data is administrative data, which hospitals collect for billing purposes. Administrative data Outpatient Facility Comments, 4Q2015.txt may not accurately represent the clinical details of an encounter. The state requires us to submit outpatient claims for patients that receive outpatient surgical or radiological services, by quarter year, gathered from a form called an UB92, in a standard government format called HCFA 837 EDI electronic claim format. Then the state specifications require additional data elements to be included over and above that. Adding those additional data places programming burdens on the hospital since it is over and above the actual hospital billing process. Errors can occur due to this additional programming, but the public should not conclude that billing data sent to our payers is inaccurate. These errors have been corrected to the best of our knowledge. If a medical record is unavailable for coding the encounter is not billed and is not included in the data submission. This represents a rare event that is less than 1% of the encounter volume. Diagnosis and Procedures Patient diagnoses and procedures for a particular outpatient hospital stay are coded by the hospital using a universal standard called the International Classification of Disease (ICD-9-CM) and Current Procedural Terminology Codes (CPT Codes). This is mandated by the federal government. The hospital complies with the guidelines for assigning these diagnosis codes; however, this is often driven by physician's subjective criteria for defining a diagnosis. For example, while one physician may diagnose a patient with anemia when the patient's blood hemoglobin level falls below 9.5, another physician may not diagnose the patient with anemia until their blood hemoglobin level is below 9.0. In both situations, a diagnosis of anemia is correctly assigned, but the criteria used by the physician to determine that diagnosis was different. An apples to apples comparison cannot be made, which makes it difficult to obtain an accurate comparison of hospital or physician performance. The codes also do not distinguish between conditions present at the time of the patient's admission to the hospital and those occurring during hospitalization. For example, if a code indicating an infection is made, it is not always possible to determine if the patient had an infection prior to admission, or developed an infection during their hospitalization. This makes it difficult to obtain accurate information regarding things such as complication rates. The data submitted matches the state's reporting requirements but may be incomplete due to a limitation on the number of diagnoses and procedures the state allows us to include for each In other words, the state's data file may not fully represent all patient. Page 26

Outpatient Facility Comments, 4Q2015.txt diagnoses treated by the hospital or all procedures performed, which can alter the true picture of a patient's hospitalization, sometimes significantly. The codes are assigned based on documentation in the patient's chart and are used by hospitals for billing purposes. The hospital can code up to 99 diagnoses and 99 procedures for each patient record. The state is requiring us to submit ICD-9-CM / CPT data on each outpatient receiving surgical or radiological services, but has limited the number of diagnoses and procedures to the first 25 diagnoses codes and the first 25 procedure codes. As a result, the data sent by us does meet state requirements but cannot reflect all the codes an individual patient's record may have been assigned. Length of Stay The length of stay data element contained in the states certification file is only three characters long. Thus any patients discharged with a length of stay greater than 999 days will not be accurately stored within the certification database. It is rare that patients stay longer than 999 days, therefore, it is not anticipated that this limitation will affect this data. Race/Ethnicitv As of the December 7, 2001, the THCIC Board indicated that they would be creating guidelines for These guidelines will provide better clarity for the accurate use by hospitals. collection of this data. Hospitals do not routinely collect race and ethnicity as part of the admission process, that this has been added to meet the THCIC requirement. Our admissions staff indicates that many patients are very sensitive about providing race 07/18/16 and ethnicity information. Therefore, depending on the circumstances of the patient's admission. race and ethnicity data may be subjectively collected. Therefore, the race and ethnicity data may not provide an accurate representation of the patient population for a facility. Standard/Non-Standard Source of Payment The standard and non-standard source of payment codes are an example of data required by the state that is not contained within the standard UB92 billing record. In order to meet this requirement, each payer identifier must be categorized into the appropriate standard and non-standard source of payment value. These values might not accurately reflect the hospital payer information, because those payers identified contractually as both HMO, and PPO are categorized as Commercial PPO. Thus any true managed care comparisons by contract type (HMO vs. PPO) may result in inaccurate analysis. Page 27

# Outpatient Facility Comments, 4Q2015.txt

Cost/ Revenue Codes The state requires that hospitals submit revenue information including charges. It is important to note that charges are not equal to actual payments received by the hospital or hospital cost for performing the service. Typically actual payments are much less than charges due to managed care-negotiated discounts and denial of payment by insurance companies. Charges also do not reflect the actual cost to deliver the care that each patient needs.

\_\_\_\_\_ \_\_\_\_\_ PROVIDER: Bowie Memorial Hospital THCIC ID: 440000 QUARTER: 4 YEAR: 2015

Certified With Comments

Bowie Memorial Hospital ceased patient operations on November 16, 2015. We are currently undergoing negotions to purchase the facility.

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PROVIDER: Christus Mother Frances Hospital Winnsboro THCIC ID: 446001 QUARTER: 4 YEAR: 2015

Certified With Comments

Approximately 0.7% of outpatient record count reflects late additions of 3Q data that was previously inadvertently omitted due to software error.

PROVIDER: Dallas Medical Center THCIC ID: 449000 QUARTER: 4 YEAR: 2015 Certified With Comments Dallas Medical Center 2015 4Q OP Certification

\_\_\_\_\_\_ PROVIDER: DeTar Hospital-Navarro THCIC ID: 453000 QUARTER: 4 YEAR: 2015

Certified With Comments

The DeTar Healthcare System includes two full-service acute care hospitals: DeTar Hospital Navarro located at 506 E. San Antonio Street and DeTar Hospital North located at 101 Medical Drive. Both acute care hospitals are located in Victoria, Texas. DeTar Healthcare System is both Joint Commission accredited and Medicare certified. The system also includes two Emergency Departments with Page 28

Outpatient Facility Comments, 4Q2015.txt Level III Trauma Designation at DeTar Hospital Navarro and Level IV Trauma Designation at DeTar Hospital North; DeTar Health Center; a comprehensive Cardiac Program including Cardiothoracic Surgery and Interventional Cardiology as well as Electrophysiology; Accredited Chest Pain Center; a Bariatric Surgery Center of Excellence, Inpatient and Outpatient Rehabilitation Centers; Inpatient Adult Behavioral Health Center; Outpatient Counseling and Wellness Center, the DeTar Senior Care Center; Senior Circle; Primary Stroke Center and a free Physician Referral Call Center. To learn more, pleas e visit our website at www.detar.com.

PROVIDER: DeTar Hospital-North THCIC ID: 453001 QUARTER: 4 YEAR: 2015

Certified With Comments

The DeTar Healthcare System includes two full-service acute care hospitals: DeTar Hospital Navarro located at 506 E. San Antonio Street and DeTar Hospital North located at 101 Medical Drive. Both acute care hospitals are located in Victoria, Texas. DeTar Healthcare System is both Joint Commission accredited and Medicare certified. The system also includes two Emergency Departments with Level III Trauma Designation at DeTar Hospital Navarro and Level IV Trauma Designation at DeTar Hospital North; DeTar Health Center; a comprehensive Cardiac Program including Cardiothoracic Surgery and Interventional Cardiology as well as Electrophysiology; Accredited Chest Pain Center; a Bariatric Surgery Center of Excellence, Inpatient and Outpatient Rehabilitation Centers; Inpatient Adult Behavioral Health Center; Outpatient Counseling and Wellness Center, the DeTar Senior Care Center; Senior Circle; Primary Stroke Center and a free Physician Referral Call Center. To learn more, pleas e visit our website at www.detar.com.

PROVIDER: Texas Health Harris Methodist Hospital Azle THCIC ID: 469000 QUARTER: 4 YEAR: 2015 Certified With Comments THCIC ID: тн469000 2015 Quarter 4 Outpatient QUARTER: Texas Health Azle CERTIFIED WITH COMMENTS Data Content This data is administrative data, which hospitals collect for billing purposes. Administrative data may not accurately represent the clinical details of an encounter. The state requires us to submit outpatient claims for patients that receive outpatient surgical or radiological services, by quarter year, gathered from a form called an UB92, in a standard government format called HCFA 837 EDI electronic claim format. Then the state specifications require additional data elements to be included over and above that. Adding those additional data places programming burdens on the hospital since it is over and above the actual hospital billing process. Errors can occur due to Page 29

Outpatient Facility Comments, 4Q2015.txt this additional programming, but the public should not conclude that billing data sent to our payers is inaccurate. These errors have been corrected to the best of our knowledge. If a medical record is unavailable for coding the encounter is not billed and is not included in the data submission. This represents a rare event that is less than 1% of the encounter volume. Diagnosis and Procedures Patient diagnoses and procedures for a particular outpatient hospital stay are coded by the hospital using a universal standard called the International Classification of Disease (ICD-9-CM) and Current Procedural Terminology Codes (CPT Codes). This is mandated by the federal government. The hospital complies with the guidelines for assigning these diagnosis codes; however, this is often driven by physician's subjective criteria for defining a diagnosis. For example, while one physician may diagnose a patient with anemia when the patient's blood hemoglobin level falls below 9.5, another physician may not diagnose the patient with anemia until their blood hemoglobin level is below 9.0. In both situations, a diagnosis of anemia is correctly assigned, but the criteria used by the physician to determine that diagnosis was different. An apples to apples comparison cannot be made, which makes it difficult to obtain an accurate comparison of hospital or physician performance. The codes also do not distinguish between conditions present at the time of the patient's admission to the hospital and those occurring during hospitalization. For example, if a code indicating an infection is made, it is not always possible to determine if the patient had an infection prior to admission, or developed an infection during their hospitalization. This makes it difficult to obtain accurate information regarding things such as complication rates. The data submitted matches the state's reporting requirements but may be incomplete due to a limitation on the number of diagnoses and procedures the state allows us to include for each In other words, the state's data file may not fully represent all patient. diagnoses treated by the hospital or all procedures performed, which can alter the true picture of a patient's hospitalization, sometimes significantly. The codes are assigned based on documentation in the patient's chart and are used by hospitals for billing purposes. The hospital can code up to 99 diagnoses and 99 procedures for each patient record. The state is requiring us to submit ICD-9-CM / CPT data on each outpatient receiving surgical or radiological services, but has limited the number of diagnoses and

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Outpatient Facility Comments, 4Q2015.txt first 25 diagnoses codes and the first 25 procedure codes. As a result, the data sent by us does meet state requirements but cannot reflect all the codes an individual patient's record may have been assigned. Length of Stay The length of stay data element contained in the states certification file is only three characters long. Thus any patients discharged with a length of stay greater than 999 days will not be accurately stored within the certification database. It is rare that patients stay longer than 999 days, therefore, it is not anticipated that this limitation will affect this data. Race/Ethnicity As of the December 7, 2001, the THCIC Board indicated that they would be creating guidelines for These guidelines will provide better clarity for the accurate use by hospitals. collection of this data. Hospitals do not routinely collect race and ethnicity as part of the admission process, that this has been added to meet the THCIC requirement. Our admissions staff indicates that many patients are very sensitive about providing race 07/18/16 4 and ethnicity information. Therefore, depending on the circumstances of the patient's admission, race and ethnicity data may be subjectively collected. Therefore, the race and ethnicity data may not provide an accurate representation of the patient population for a facility. Standard/Non-Standard Source of Payment The standard and non-standard source of payment codes are an example of data required by the state that is not contained within the standard UB92 billing record. In order to meet this requirement, each payer identifier must be categorized into the appropriate standard and non-standard source of payment value. These values might not accurately reflect the hospital payer information, because those payers identified contractually as both HMO, and PPO are categorized as Commercial PPO. Thus any true managed care comparisons by contract type (HMO vs. PPO) may result in inaccurate analysis. Cost/ Revenue Codes The state requires that hospitals submit revenue information including charges. It is important to note that charges are not equal to actual payments received by the hospital or hospital cost for performing the service. Typically actual payments are much less than charges due to managed care-negotiated discounts and denial of payment by insurance companies. Charges also do not reflect the actual cost to deliver the care that each patient needs.

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PROVIDER: Parkland Memorial Hospital THCIC ID: 474000 QUARTER: 4 YEAR: 2015

Certified With Comments

Parkland Health & Hospital System comprises a network of neighborhood-based health centers and Parkland Memorial Hospital, which was established in 1894. The Parkland System is a \$1.271 billion enterprise that is licensed for 862 beds and employs approximately 10,718 staff. 93,340 patients received outpatient care in the clinics (both on campus and in the neighborhood-based health centers) this quarter.

Specific Data Concerns

As in other large academic medical centers, teams of physicians rotating at intervals care for patients. The THCIC dataset allows only one primary physician to be assigned to the patient for the entire inpatient stay. In our institution, this represents the physician caring for the patient at the time of discharge. Many patients, particularly long-term care patients are actually managed by as many as three to four different teams and attending physicians. For this reason, the practice of attributing patient outcomes to the report card of a single physician may result in misleading information.

PROVIDER: Seton Medical Center THCIC ID: 497000 QUARTER: 4 YEAR: 2015

Certified With Comments

Seton Medical Center Austin has a transplant program and Neonatal Intensive Care Unit (NICU). Hospitals with transplant programs generally serve a more seriously ill patient, increasing costs and mortality rates. The NICU serves very seriously ill infants substantially increasing cost, lengths of stay and mortality rates. As a regional referral center and tertiary care hospital for cardiac and critical care services, Seton Medical Center Austin receives numerous transfers from hospitals not able to serve a more complex mix of patients. This increased patient complexity may lead to longer lengths of stay, higher costs and increased mortality.

All physician license numbers and names have been validated with the Physician and the Texas State Board of Medical Examiner website as accurate but some remain unidentified in the THCIC Practitioner Reference Files.

These data are submitted by the hospital as their best effort to meet statutory requirements.

PROVIDER: Shriners Hospitals for Children
THCIC ID: 526000
QUARTER: 4
YEAR: 2015

Outpatient Facility Comments, 4Q2015.txt Certified With Comments The number provided by the State are incorrect. We produced a correct file. The State had an internal failure, or whatever method they are using to read the number is wrong. These are the FIN counts that are in the Q4 2015 file. Encounter Counts by Month November 2015 (Outpatient) : 549 October 2015 (Outpatient) : 656 December 2015 (Outpatient) : 534 October 2015 (Outpatient Surgery) : 39 November 2015 (Outpatient Surgery) : 45 December 2015 (Outpatient Surgery) : 31 \_\_\_\_\_ PROVIDER: Bellville St Joseph Health Center THCIC ID: 552000 QUARTER: 4 YEAR: 2015 Certified With Comments Certified by Karen McEuen \_ PROVIDER: Seton Highland Lakes Hospital THCIC ID: 559000 QUARTER: 4 YEAR: 2015 Certified With Comments Seton Highland Lakes, a member of the Seton Family of Hospitals, is a 25-bed acute care facility located between Burnet and Marble Falls on Highway 281. The hospital offers 24-hour Emergency services, plus comprehensive diagnostic and treatment services for residents in the surrounding area. Seton Highland Lakes also offers home health and hospice services. For primary and preventive care, Seton Highland Lakes offers a clinic in Burnet, a clinic in Marble Falls, a clinic in Bertram, a clinic in Lampasas, and a pediatric mobile clinic in the county. This facility is designated by the Center for Medicare & Medicaid Services as a Critical Access Hospital and is fully accredited by the Joint Commission on Accreditation of Healthcare Organizations under its Critical Access designation program. PROVIDER: Seton Edgar B Davis Hospital THCIC ID: 597000 QUARTER: 4 YEAR: 2015 Certified With Comments Seton Edgar B. Davis, a member of the Seton Family of Hospitals, is a

general acute care, 25-bed facility committed to providing quality inpatient and outpatient services for residents of Caldwell and surrounding counties. Seton Edgar B. Davis offers health education and wellness programs. In Outpatient Facility Comments, 4Q2015.txt addition, specialists offer a number of outpatient specialty clinics providing area residents local access to the services of medical specialists. Seton Edgar B. Davis is located at 130 Hays St. in Lulling, Texas. This facility is designated by the Center for Medicare & Medicaid Services as a Critical Access Hospital and is fully accredited by the Joint Commission on Accreditation of Healthcare Organizations under its Critical Access program.

PROVIDER: Texas Health Harris Methodist Hospital-Southwest Fort Worth THCIC ID: 627000 QUARTER: 4 YEAR: 2015 Certified With Comments THCIC ID: тн627000 QUARTER: 2015 Quarter 4 Outpatient Texas Health Southwest CERTIFIED WITH COMMENTS Data Content This data is administrative data, which hospitals collect for billing purposes. Administrative data may not accurately represent the clinical details of an encounter. The state requires us to submit outpatient claims for patients that receive outpatient surgical or radiological services, by quarter year, gathered from a form called an UB92, in a standard government format called HCFA 837 EDI electronic claim format. Then the state specifications require additional data elements to be included over and above that. Adding those additional data places programming burdens on the hospital since it is over and above the actual hospital billing process. Errors can occur due to this additional programming, but the public should not conclude that billing data sent to our payers is inaccurate. These errors have been corrected to the best of our knowledge. If a medical record is unavailable for coding the encounter is not billed and is not included in the data submission. This represents a rare event that is less than 1% of the encounter volume. Diagnosis and Procedures Patient diagnoses and procedures for a particular outpatient hospital stay are coded by the hospital using a universal standard called the International Classification of Disease (ICD-9-CM) and Current Procedural Terminology Codes (CPT Codes). This is mandated by the federal government. The hospital complies with the guidelines for assigning these diagnosis codes; however, this is often driven by physician' subjective criteria for defining a diagnosis. For example, while one physician may diagnose a patient with anemia when the patient's blood hemoglobin level falls below 9.5, another physician may not diagnose the patient with anemia until their blood hemoglobin level is Page 34

# Outpatient Facility Comments, 4Q2015.txt

below 9.0. In both situations, a diagnosis of anemia is correctly assigned, but the criteria used by the physician to determine that diagnosis was different. An apples to apples comparison cannot be made, which makes it difficult to obtain an accurate comparison of hospital or physician performance. The codes also do not distinguish between conditions present at the time of the patient's admission to the hospital and those occurring during hospitalization. For example, if a code indicating an infection is made, it is not always possible to determine if the patient had an infection prior to admission, or developed an infection during their hospitalization. This makes it difficult to obtain accurate information regarding things such as complication rates. The data submitted matches the state's reporting requirements but may be incomplete due to a limitation on the number of diagnoses and procedures the state allows us to include for each In other words, the state's data file may not fully represent all patient. diagnoses treated by the hospital or all procedures performed, which can alter the true picture of a patient's hospitalization, sometimes significantly. The codes are assigned based on documentation in the patient's chart and are used by hospitals for billing purposes. The hospital can code up to 99 diagnoses and 99 procedures for each patient record. The state is requiring us to submit ICD-9-CM / CPT data on each outpatient receiving surgical or radiological services, but has limited the number of diagnoses and procedures to the first 25 diagnoses codes and the first 25 procedure codes. As a result, the data sent by us does meet state requirements but cannot reflect all the codes an individual patient's record may have been assigned. Length of Stay The length of stay data element contained in the states certification file is only three characters long. Thus any patients discharged with a length of stay greater than 999 days will not be accurately stored within the certification database. It is rare that patients stay longer than 999 days, therefore, it is not anticipated that this limitation will affect this data. Race/Ethnicity As of the December 7, 2001, the THCIC Board indicated that they would be creating guidelines for use by hospitals. These guidelines will provide better clarity for the accurate collection of this data. Hospitals do not routinely collect race and ethnicity as part of the admission process, that this has been added to meet the THCIC requirement. Our admissions staff indicates that many patients are very sensitive about providing race

Outpatient Facility Comments, 4Q2015.txt 07/18/16 4 and ethnicity information. Therefore, depending on the circumstances of the patient's admission, race and ethnicity data may be subjectively collected. Therefore, the race and ethnicity data may not provide an accurate representation of the patient population for a facility. Standard/Non-Standard Source of Payment The standard and non-standard source of payment codes are an example of data required by the state that is not contained within the standard UB92 billing record. In order to meet this requirement, each payer identifier must be categorized into the appropriate standard and non-standard source of payment value. These values might not accurately reflect the hospital payer information, because those payers identified contractually as both HMO, and PPO are categorized as Commercial PPO. Thus any true managed care comparisons by contract type (HMO vs. PPO) may result in inaccurate analysis. Cost/ Revenue Codes The state requires that hospitals submit revenue information including charges. It is important to note that charges are not equal to actual payments received by the hospital or hospital cost for performing the service. Typically actual payments are much less than charges due to managed care-negotiated discounts and denial of payment by insurance companies. Charges also do not reflect the actual cost to deliver the care that each patient needs. \_\_\_\_\_ PROVIDER: Hamilton General Hospital THCIC ID: 640000 QUARTER: 4 YEAR: 2015 Certified With Comments All data available at time of reporting has been submitted. Any missing data fields not submitted are duw to data being unverifiable at the time of data submission deadline. \_\_\_\_\_ PROVIDER: Texas Health Presbyterian Hospital-Plano THCIC ID: 664000 QUARTER: 4

YEAR: 2015 Certified With Comments Data Content This data is administrative data, which hospitals collect for billing purposes. Administrative data may not accurately represent the clinical details of an encounter.
The state requires us to submit outpatient claims for patients that receive outpatient surgical or radiological services, by quarter year, gathered from a form called an UB92, in a standard government format called HCFA 837 EDI electronic claim format. Then the state specifications require additional data elements to be included over and above that. Adding those additional data places programming burdens on the hospital since it is over and above the actual hospital billing process. Errors can occur due to this additional programming, but the public should not conclude that billing data sent to our payers is inaccurate. These errors have been corrected to the best of our knowledge.

If a medical record is unavailable for coding the encounter is not billed and is not included in the data submission. This represents a rare event that is less than 1% of the encounter volume.

#### Diagnosis and Procedures

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The data submitted matches the state's reporting requirements but may be incomplete due to a limitation on the number of diagnoses and procedures the state allows us to include for each patient. In other words, the state's data file may not fully represent all diagnoses treated by the hospital or all procedures performed, which can alter the true picture of a patient's hospitalization, sometimes significantly.

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Cost/ Revenue Codes

The state requires that hospitals submit revenue information including charges. It is important to note that charges are not equal to actual payments received by the hospital or hospital cost for performing the service. Typically actual payments are much less than charges due to managed care-negotiated discounts and denial of payment by insurance companies. Charges also do not reflect the actual cost to deliver the care that each patient needs.

\_\_\_\_\_ PROVIDER: Center for Assisted Reproduction THCIC ID: 712700 QUARTER: 4 YEAR: 2015 Certified With Comments Unable to correct the missing info on a few claims prior to this Certification. PROVIDER: CHRISTUS St Michael Rehab Hospital THCIC ID: 713001 QUARTER: 4 YEAR: 2015 Certified With Comments To the best of my knowledge, I certify this report. PROVIDER: Nacogdoches Surgery Center THCIC ID: 723800 QUARTER: 4 YEAR: 2015 Certified With Comments AS IS.

THCIC ID: 724200 QUARTER: 4 YEAR: 2015

Certified With Comments

Data Content This data is administrative data, which hospitals collect for billing purposes. Administrative data may not accurately represent the clinical details of an encounter.

The state requires us to submit outpatient claims for patients that receive outpatient surgical or radiological services, by quarter year, gathered from a form called an UB92, in a standard government format called HCFA 837 EDI electronic claim format. Then the state specifications require additional data elements to be included over and above that. Adding those additional data places programming burdens on the hospital since it is over and above the actual hospital billing process. Errors can occur due to this additional programming, but the public should not conclude that billing data sent to our payers is inaccurate. These errors have been corrected to the best of our knowledge.

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## Diagnosis and Procedures

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The state requires that hospitals submit revenue information including charges. It is important to note that charges are not equal to actual payments received by the hospital or hospital cost for performing the service. Typically actual payments are much less than charges due to managed care-negotiated discounts and denial of payment by insurance companies. Charges also do not reflect the actual cost to deliver the care that each patient needs.

PROVIDER: Houston Methodist Willowbrook Hospital THCIC ID: 724700 QUARTER: 4 YEAR: 2015 Certified With Comments

Salvador for Willowbrook hospital

PROVIDER: Christus Mother Frances Hospital-Jacksonville THCIC ID: 725400 QUARTER: 4 YEAR: 2015

Certified With Comments

Approximately 0.5% of outpatient record count reflect late additions of 3Q data that was previously inadvertently omitted due to software error.

PROVIDER: Piney Point Surgery Center THCIC ID: 728100

QUARTER: 4 YEAR: 2015

Certified With Comments

Error E-625, record is a same sex couple.

PROVIDER: Texas Health Heart & Vascular Hospital THCIC ID: 730001 QUARTER: 4 YEAR: 2015

Certified With Comments

Data Content

This data is administrative data, which hospitals collect for billing purposes. Administrative data may not accurately represent the clinical details of an encounter.

The state requires us to submit outpatient claims for patients that receive outpatient surgical or radiological services, by quarter year, gathered from a form called an UB92, in a standard government format called HCFA 837 EDI electronic claim format. Then the state specifications require additional data elements to be included over and above that. Adding those additional data places programming burdens on the hospital since it is over and above the actual hospital billing process. Errors can occur due to this additional programming, but the public should not conclude that billing data sent to our payers is inaccurate. These errors have been corrected to the best of our knowledge. If a medical record is unavailable for coding the encounter is not billed and is not included in the data submission. This represents a rare event that is less than 1% of the encounter volume.

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not diagnose the patient with anemia until their blood hemoglobin level is below 9.0. In both situations, a diagnosis of anemia is correctly assigned, but the criteria used by the physician to determine that diagnosis was different. An apples to apples comparison cannot be made, which makes it difficult to obtain an accurate comparison of hospital or physician performance.

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Outpatient Facility Comments, 4Q2015.txt services, but has limited the number of diagnoses and procedures to the first 25 diagnoses codes and the first 25 procedure codes. As a result, the data sent by us does meet state requirements but cannot reflect all the codes an individual patient's record may have been assigned. Length of Stay The length of stay data element contained in the states certification file is only three characters long. Thus any patients discharged with a length of stay greater than 999 days will not be accurately stored within the certification database. It is rare that patients stay longer than 999 days, therefore, it is not anticipated that this limitation will affect this data. Race/Ethnicity As of the December 7, 2001, the THCIC Board indicated that they would be creating guidelines for use by hospitals. These guidelines will provide better clarity for the accurate collection of this data. Hospitals do not routinely collect race and ethnicity as part of the admission process, that this has been added to meet the THCIC requirement. Our admissions staff indicates that many patients are very sensitive about providing race and ethnicity information. Therefore, depending on the circumstances of the patient's admission, race and ethnicity data may be subjectively collected. Therefore, the race and ethnicity data may not provide an accurate representation of the patient population for a facility. Standard/Non-Standard Source of Payment The standard and non-standard source of payment codes are an example of data required by the state that is not contained within the standard UB92 billing record. In order to meet this requirement, each payer identifier must be categorized into the appropriate standard and non-standard source of payment value. These values might not accurately reflect the hospital payer information, because those payers identified contractually as both HMO, and PPO are categorized as Commercial PPO. Thus any true managed care comparisons by contract type (HMO vs. PPO) may result in inaccurate analysis. Cost/ Revenue Codes The state requires that hospitals submit revenue information including charges. It is important to note that charges are not equal to actual payments received by the hospital or hospital cost for performing the service. Typically actual payments are much less than charges due to managed care-negotiated discounts and denial of payment by insurance companies. Charges also do not reflect the actual cost to deliver the care that each patient needs.

PROVIDER: St Lukes Hospital at the Vintage THCIC ID: 740000 QUARTER: 4 YEAR: 2015

Certified With Comments

The data reports for Quarter 4, 2015 do not accurately reflect patient volume or severity.

Patient Volume

Data reflects administrative claims data (Uniform Billing data elements) that are a snapshot of claims that have been billed prior to the reporting deadline. If the encounter has not yet been billed, data will not be reflected in this quarter.

Severity

Not all clinically significant conditions, such as the hearts ejection fraction,

Outpatient Facility Comments, 4Q2015.txt can be captured and reflected in the various billing data elements including the ICD-9-CM diagnosis coding system. As a result, the true clinical picture of the patient population cannot be adequately demonstrated using admissions and billing data.

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Payer Source

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A payer source mapping discrepancy has been identified. The HIS vendor is working towards a resolution.

PROVIDER: Baylor Heart & Vascular Center THCIC ID: 784400 QUARTER: 4 YEAR: 2015

Certified With Comments

Due to the sheer volume of OP data, we have limited resources as a hospital to analyze the data. Regarding the mandate to communicate the Certification reports to physicians The State does not offer a secure mechanism for us to communicate other than the hard copy reports. At this time, we as a hospital are moving to limit or eliminate paper distribution and we do not have an internal system to communicate to all physicians feasibly.

Quality Trending of data over a few years is important to define outcome and quality. A small sampling of data (i.e. one year) does not explain outcome.

We recommend the Patient communicate with the Hospital and the Physician regarding data. Patient and physician preference contributes to the care rendered to the patient and the data does not always reflect this.

Patients and physicians consider many factors when making health care decisions that are not available in administrative data. These include a patients preference for life-sustaining treatments, functional status, and other factors.

We support the Patient, Provider, and Payer and empowered, educated decision-making. Quality improvement is not new; it is an on-going commitment.

PROVIDER: South Texas Spine & Surgical Hospital THCIC ID: 786800 QUARTER: 4 YEAR: 2015 Certified with Comments Certify without comment. PROVIDER: CHRISTUS St Michael Health System THCIC ID: 788001 QUARTER: 4 YEAR: 2015 Certified with Comments To the best of my knowledge, I approve.

\_\_\_\_\_ PROVIDER: Christus St Michael Hospital Atlanta THCIC ID: 788003 QUARTER: 4 YEAR: 2015 Certified With Comments To the best of my knowledge, I approve. PROVIDER: St Lukes The Woodlands Hospital THCIC ID: 793100 QUARTER: 4 YEAR: 2015 Certified With Comments The data reports for Quarter 4, 2015 do not accurately reflect patient volume or severity. Patient Volume Data reflects administrative claims data (Uniform Billing data elements) that are a snapshot of claims that have been billed prior to the reporting deadline. If the encounter has not yet been billed, data will not be reflected in this quarter. Severity Not all clinically significant conditions, such as the hearts ejection fraction, can be captured and reflected in the various billing data elements including the ICD-9-CM diagnosis coding system. As a result, the true clinical picture of the patient population cannot be adequately demonstrated using admissions and billing data. Payer Source A payer source mapping discrepancy has been identified. The HIS vendor is working towards a resolution. \_\_\_\_\_ \_\_\_\_\_ PROVIDER: Hill Country Memorial Surgery Center THCIC ID: 793300 QUARTER: 4 YEAR: 2015 Certified With Comments CLAIMS CHECKED AND NO ERRORS PROVIDER: Doctors Hospital-Renaissance THCIC ID: 797100 QUARTER: 4 YEAR: 2015 Certified With Comments Doctors Hospital at Renaissance Outpatient Surgical Center started reporting Page 44

Outpatient Facility Comments, 4Q2015.txt seperately therefore there will be a difference.

PROVIDER: Seton Southwest Hospital THCIC ID: 797500 QUARTER: 4 YEAR: 2015

Certified With Comments

All physician license numbers and names have been validated with the Physician and the Texas State Board of Medical Examiner website as accurate but some remain unidentified in the THCIC Practitioner Reference Files.

These data are submitted by the hospital as their best effort to meet statutory requirements.

PROVIDER: Seton Northwest Hospital THCIC ID: 797600

THCIC ID: 797600 QUARTER: 4 YEAR: 2015

Certified With Comments

All physician license numbers and names have been validated with the Physician and the Texas State Board of Medical Examiner website as accurate but some remain unidentified in the THCIC Practitioner Reference Files.

These data are submitted by the hospital as their best effort to meet statutory requirements.

PROVIDER: Community Surgery Center THCIC ID: 807500 QUARTER: 4 YEAR: 2015

Certified With Comments

Patient Accounts Director and HIM Director discussed the issue of Race and Ethnicity not being captured 100% of the time. Process will be discussed with admissions to add this information for every patient.

PROVIDER: Texas Institute for Surgery-Texas Health Presbyterian-Dallas THCIC ID: 813100 QUARTER: 4 YEAR: 2015 Certified With Comments Files may contain duplicate and/or missing claims

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PROVIDER: Spinecare THCIC ID: 816900 QUARTER: 4 \_\_\_\_\_\_

YEAR: 2015 Certified With Comments DATA IS GENERATED FROM SCHEDULING SOFTWARE. WE CANNOT GUARANTEE 100% ACCURACY. PROVIDER: Texas Health Presbyterian Hospital-Denton THCIC ID: 820800 QUARTER: 4 YEAR: 2015 Certified With Comments THCIC ID: тн820800 OUARTER: 2015 Quarter 4 Outpatient Texas Health Denton CERTIFIED WITH COMMENTS Data Content This data is administrative data, which hospitals collect for billing purposes. Administrative data may not accurately represent the clinical details of an encounter. The state requires us to submit outpatient claims for patients that receive outpatient surgical or radiological services, by quarter year, gathered from a form called an UB92, in a standard government format called HCFA 837 EDI electronic claim format. Then the state specifications require additional data elements to be included over and above that. Adding those additional data places programming burdens on the hospital since it is over and above the actual hospital billing process. Errors can occur due to this additional programming, but the public should not conclude that billing data sent to our payers is inaccurate. These errors have been corrected to the best of our knowledge. If a medical record is unavailable for coding the encounter is not billed and is not included in the data submission. This represents a rare event that is less than 1% of the encounter volume. Diagnosis and Procedures Patient diagnoses and procedures for a particular outpatient hospital stay are coded by the hospital using a universal standard called the International Classification of Disease (ICD-9-CM) and Current Procedural Terminology Codes (CPT Codes). This is mandated by the federal government. The hospital complies with the guidelines for assigning these diagnosis codes; however, this is often driven by physician's subjective criteria for defining a diagnosis. For example, while one physician may diagnose a patient with anemia when the patient's blood hemoglobin level falls below 9.5, another physician may not diagnose the patient with anemia until their blood hemoglobin level is below 9.0. In both

Outpatient Facility Comments, 4Q2015.txt

Outpatient Facility Comments, 4Q2015.txt situations, a diagnosis of anemia is correctly assigned, but the criteria used by the physician to determine that diagnosis was different. An apples to apples comparison cannot be made, which makes it difficult to obtain an accurate comparison of hospital or physician performance. The codes also do not distinguish between conditions present at the time of the patient's admission to the hospital and those occurring during hospitalization. For example, if a code indicating an infection is made, it is not always possible to determine if the patient had an infection prior to admission, or developed an infection during their hospitalization. This makes it difficult to obtain accurate information regarding things such as complication rates. The data submitted matches the state's reporting requirements but may be incomplete due to a limitation on the number of diagnoses and procedures the state allows us to include for each patient. In other words, the state's data file may not fully represent all diagnoses treated by the hospital or all procedures performed, which can alter the true picture of a patient's hospitalization, sometimes significantly. The codes are assigned based on documentation in the patient's chart and are used by hospitals for billing purposes. The hospital can code up to 99 diagnoses and 99 procedures for each patient record. The state is requiring us to submit ICD-9-CM / CPT data on each outpatient receiving surgical or radiological services, but has limited the number of diagnoses and procedures to the first 25 diagnoses codes and the first 25 procedure codes. As a result, the data sent by us does meet state requirements but cannot reflect all the codes an individual patient's record may have been assigned. Length of Stay The length of stay data element contained in the states certification file is only three characters long. Thus any patients discharged with a length of stay greater than 999 days will not be accurately stored within the certification database. It is rare that patients stay longer than 999 days, therefore, it is not anticipated that this limitation will affect this data. Race/Ethnicity As of the December 7, 2001, the THCIC Board indicated that they would be creating guidelines for These guidelines will provide better clarity for the accurate use by hospitals. collection of this data. Hospitals do not routinely collect race and ethnicity as part of the admission process, that this has been added to meet the THCIC requirement. Our admissions staff indicates that many patients are very sensitive about providing race 07/18/16

4 and ethnicity information. Therefore, depending on the circumstances of the patient's admission, race and ethnicity data may be subjectively collected. Therefore, the race and ethnicity data may not provide an accurate representation of the patient population for a facility. Standard/Non-Standard Source of Payment The standard and non-standard source of payment codes are an example of data required by the state that is not contained within the standard UB92 billing record. In order to meet this requirement, each payer identifier must be categorized into the appropriate standard and non-standard source of payment value. These values might not accurately reflect the hospital payer information, because those payers identified contractually as both HMO, and PPO are categorized as Commercial PPO. Thus any true managed care comparisons by contract type (HMO vs. PPO) may result in inaccurate analysis. Cost/ Revenue Codes The state requires that hospitals submit revenue information including charges. It is important to note that charges are not equal to actual payments received by the hospital or hospital cost for performing the service. Typically actual payments are much less than charges due to managed care-negotiated discounts and denial of payment by insurance companies. Charges also do not reflect the actual cost to deliver the care that each patient needs. \_\_\_\_\_ \_\_\_\_\_\_ PROVIDER: Houston Methodist Sugar Land Hospital THCIC ID: 823000 QUARTER: 4 YEAR: 2015 Certified With Comments approve as per IT file \_\_\_\_\_ PROVIDER: Memorial Hermann Surgery Center Woodlands THCIC ID: 825400 QUARTER: 4 YEAR: 2015 Certified With Comments No Comments

PROVIDER: Dallas Endoscopy Center THCIC ID: 826200 QUARTER: 4

Outpatient Facility Comments, 4Q2015.txt YEAR: 2015 Certified With Comments i did a spot check on a few claims and it looks to be accurate. PROVIDER: Pampa Regional Medical Center THCIC ID: 832900 QUARTER: 4 YEAR: 2015 Certified With Comments Pampa Regional Med Center - 2015 4Q OP Certification \_\_\_\_\_ PROVIDER: Rockwall Ambulatory Surgery Center THCIC ID: 841800 QUARTER: 4 YEAR: 2015 Elected Not to Certify Current Certifier was not at this facility during these events. In regards to the duplicate events- 2 seperate physicians performed seperate procedures on the patients listed, and only one operating room was used on the same date of service. PROVIDER: Simmons Ambulatory Surgery Center THCIC ID: 843300 QUARTER: 4 YEAR: 2015 Certified With Comments Parkland Health & Hospital System comprises a network of neighborhood-based health centers and Parkland Memorial Hospital, which was established in 1894. The Parkland System is a \$1.271 billion enterprise that is licensed for 862 beds and employs approximately 10,718 staff. 93,340 patients received outpatient care in the clinics (both on campus and in the neighborhood-based

Specific Data Concerns

health centers) this guarter.

As in other large academic medical centers, teams of physicians rotating at intervals care for patients. The THCIC dataset allows only one primary physician to be assigned to the patient for the entire inpatient stay. In our institution, this represents the physician caring for the patient at the time of discharge. Many patients, particularly long-term care patients are actually managed by as many as three to four different teams and attending physicians. For this reason, the practice of attributing patient outcomes to the report card of a single physician may result in misleading information.

THCIC ID: 848900 QUARTER: 4 YEAR: 2015

Certified With Comments

Please disregard the ethnicity errors on all claims for 4th Q 2015. We had a vendor update and was not able to recreate a correct ethnicity code for claims .

PROVIDER: Cook Childrens Northeast Hospital THCIC ID: 850200 QUARTER: 4 YEAR: 2015

Certified With Comments

Due to an issue with the bridge routine between the patient account software and the billing software which drops claims to THCIC the Patient Race is not pulling over accurately. and this was the case during the time period of these claims.

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PROVIDER: Dell Childrens Medical Center
THCIC ID: 852000
QUARTER: 4
YEAR: 2015
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Certified With Comments

Dell Children's Medical Center of Central Texas (DCMCCT) is the only children's hospital in the Central Texas Region. DCMCCT serves severely ill and/or injured children requiring intensive resources which increases the hospital's costs of care, lengths of stay and mortality rates. In addition, the hospital includes a Neonatal Intensive Care Unit (NICU) which serves very seriously ill infants, which substantially increases costs of care, lengths of stay and mortality rates.

All physician license numbers and names have been validated with the Physician and the Texas State Board of Medical Examiner website as accurate but some remain unidentified in the THCIC Practitioner Reference Files.

These data are submitted by the hospital as their best effort to meet statutory requirements.

PROVIDER: Lake Pointe Surgery Center THCIC ID: 856820 QUARTER: 4 YEAR: 2015 Certified With Comments

Incorrect data: we did not operate on patients less than 1 year of age.

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Certified With Comments

Files may contain duplicate and/or missing claims

PROVIDER: Seton Medical Center Williamson THCIC ID: 861700 QUARTER: 4 YEAR: 2015

Certified With Comments

All physician license numbers and names have been validated with the Physician and the Texas State Board of Medical Examiner website as accurate but some remain unidentified in the THCIC Practitioner Reference Files.

These data are submitted by the hospital as their best effort to meet statutory requirements.

PROVIDER: Methodist Willowbrook Hospital Outpatient Surgery Department THCIC ID: 862300 QUARTER: 4 YEAR: 2015

Certified With Comments

Salvador for Willowbrook hospital

PROVIDER: St Lukes Sugar Land Hospital THCIC ID: 869700 QUARTER: 4 YEAR: 2015

Certified With Comments

The data reports for Quarter 4, 2015 do not accurately reflect patient volume or severity.

Patient Volume

Data reflects administrative claims data (Uniform Billing data elements) that are a snapshot of claims that have been billed prior to the reporting deadline. If the encounter has not yet been billed, data will not be reflected in this quarter.

Severity

Not all clinically significant conditions, such as the hearts ejection fraction, can be captured and reflected in the various billing data elements including the ICD-9-CM diagnosis coding system. As a result, the true clinical picture of the patient population cannot be adequately demonstrated using admissions and billing data.

Payer Source A payer source mapping discrepancy has been identified. The HIS vendor is working towards a resolution.

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PROVIDER: Womens Specialty Surgery Center of Dallas THCIC ID: 912000 QUARTER: 4 YEAR: 2015

Certified With Comments

To the best of my knowledge I "certify" the data this quarter was uploaded from a file in our current practice management software. The file created was to fill data requirements for claims for the quarter. Errors listed in the FOE report on THCIC were corrected. Each individual claim contained was not reviewed and compared to the original entry. I am not responsible for errors or discrepancy in data that is due to software malfunction or file transfer and mapping. I do not have any reason to think the data is compromised.

\_\_\_\_\_ ------PROVIDER: CHRISTUS Santa Rosa Physicians ASC New Braunfels THCIC ID: 917000 QUARTER: 4 YEAR: 2015 Certified With Comments 98.75% **PROVIDER:** Seton Medical Center Hays THCIC ID: 921000 QUARTER: 4 YEAR: 2015 Certified With Comments All physician license numbers and names have been validated with the Physician and the Texas State Board of Medical Examiner website as accurate but some remain unidentified in the THCIC Practitioner Reference Files. These data are submitted by the hospital as their best effort to meet statutory requirements. **PROVIDER:** St Lukes Lakeside Hospital THCIC ID: 923000 QUARTER: 4 YEAR: 2015 Certified With Comments The data reports for Quarter 4, 2015 do not accurately reflect patient volume or severity. Patient Volume

Data reflects administrative claims data (Uniform Billing data elements) that are a snapshot of claims that have been billed prior to the reporting deadline. If the encounter has not yet been billed, data will not be reflected in this quarter.

Outpatient Facility Comments, 4Q2015.txt Severity Not all clinically significant conditions, such as the hearts ejection fraction, can be captured and reflected in the various billing data elements including the ICD-9-CM diagnosis coding system. As a result, the true clinical picture of the patient population cannot be adequately demonstrated using admissions and billing data. Payer Source A payer source mapping discrepancy has been identified. The HIS vendor is working towards a resolution. \_\_\_\_\_ PROVIDER: Texas Health Presbyterian Hospital Flower Mound THCIC ID: 943000 OUARTER: 4 YEAR: 2015 Certified With Comments Files may contain duplicate and/or missing claims- 2nd time/ File was reprocessed per System 13 PROVIDER: Texas Health Harris Methodist Fort Worth Outpatient Surgery Center THCIC ID: 970100 QUARTER: 4 YEAR: 2015 Certified With Comments Data Content This data is administrative data, which hospitals collect for billing purposes. Administrative data may not accurately represent the clinical details of an encounter. The state requires us to submit outpatient claims for patients that receive outpatient surgical or radiological services, by quarter year, gathered from a form called an UB92, in a standard government format called HCFA 837 EDI electronic claim format. Then the state specifications require additional data elements to be included over and above that. Adding those additional data places programming burdens on the hospital since it is over and above the actual hospital billing process. Errors can occur due to this additional programming, but the public should not conclude that billing data sent to our payers is inaccurate. These errors have been corrected to the best of our knowledge. If a medical record is unavailable for coding the encounter is not billed and is not included in the data submission. This represents a rare event that is less than 1% of the encounter volume. Diagnosis and Procedures Patient diagnoses and procedures for a particular outpatient hospital stay are coded by the hospital using a universal standard called the International Classification of Disease (ICD 9 CM) and Current Procedural Terminology Codes (CPT Codes). This is mandated by the federal government. The hospital complies with the guidelines for assigning these diagnosis codes; however, this is often driven by physician's subjective criteria for defining a diagnosis. For example, while one physician may diagnose a patient with anemia when the patient's blood hemoglobin level falls below 9.5, another physician may not diagnose the patient with anemia until their blood hemoglobin level is below 9.0. In both situations, a diagnosis of anemia is correctly assigned, but the Page 53

Outpatient Facility Comments, 4Q2015.txt criteria used by the physician to determine that diagnosis was different. An apples to apples comparison cannot be made, which makes it difficult to obtain an accurate comparison of hospital or physician performance.

The codes also do not distinguish between conditions present at the time of the patient's admission to the hospital and those occurring during hospitalization. For example, if a code indicating an infection is made, it is not always possible to determine if the patient had an infection prior to admission, or developed an infection during their hospitalization. This makes it difficult to obtain accurate information regarding things such as complication rates.

The data submitted matches the state's reporting requirements but may be incomplete due to a limitation on the number of diagnoses and procedures the state allows us to include for each patient. In other words, the state's data file may not fully represent all diagnoses treated by the hospital or all procedures performed, which can alter the true picture of a patient's hospitalization, sometimes significantly.

The codes are assigned based on documentation in the patient's chart and are used by hospitals for billing purposes. The hospital can code up to 99 diagnoses and 99 procedures for each patient record. The state is requiring us to submit ICD-9-CM / CPT data on each outpatient receiving surgical or radiological services, but has limited the number of diagnoses and procedures to the first 25 diagnoses codes and the first 25 procedure codes. As a result, the data sent by us does meet state requirements but cannot reflect all the codes an individual patient's record may have been assigned.

## Length of Stay

The length of stay data element contained in the states certification file is only three characters long. Thus any patients discharged with a length of stay greater than 999 days will not be accurately stored within the certification database. It is rare that patients stay longer than 999 days, therefore, it is not anticipated that this limitation will affect this data. Race/Ethnicity

As of the December 7, 2001, the THCIC Board indicated that they would be creating guidelines for use by hospitals. These guidelines will provide better clarity for the accurate collection of this data. Hospitals do not routinely collect race and ethnicity as part of the admission process, that this has been added to meet the THCIC requirement. Our admissions staff indicates that many patients are very sensitive about providing race and ethnicity information. Therefore, depending on the circumstances of the patient's admission, race and ethnicity data may be subjectively collected. Therefore, the race and ethnicity data may not provide an accurate representation of the patient population for a facility.

#### Standard/Non-Standard Source of Payment

The standard and non-standard source of payment codes are an example of data required by the state that is not contained within the standard UB92 billing record. In order to meet this requirement, each payer identifier must be categorized into the appropriate standard and non-standard source of payment value. These values might not accurately reflect the hospital payer information, because those payers identified contractually as both HMO, and PPO are categorized as Commercial PPO. Thus any true managed care comparisons by contract type (HMO vs. PPO) may result in inaccurate analysis.

#### Cost/ Revenue Codes

The state requires that hospitals submit revenue information including charges. It is important to note that charges are not equal to actual payments received by the hospital or hospital cost for performing the service. Typically actual payments are much less than charges due to managed care-negotiated discounts and denial of payment by insurance companies. Charges also do not reflect the actual cost to deliver the care that each patient needs.

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PROVIDER: Texas Health Outpatient Surgery Center Alliance THCIC ID: 970110 QUARTER: 4 YEAR: 2015 Certified With Comments THCIC ID: тн970110 OUARTER: 2015 Quarter 4 Outpatient Texas Health Alliance Outpatient Surgery Center CERTIFIED WITH COMMENTS Data Content This data is administrative data, which hospitals collect for billing purposes. Administrative data may not accurately represent the clinical details of an encounter. The state requires us to submit outpatient claims for patients that receive outpatient surgical or radiological services, by quarter year, gathered from a form called an UB92, in a standard government format called HCFA 837 EDI electronic claim format. Then the state specifications require additional data elements to be included over and above that. Adding those additional data places programming burdens on the hospital since it is over and above the actual hospital billing process. Errors can occur due to this additional programming, but the public should not conclude that billing data sent to our payers is inaccurate. These errors have been corrected to the best of our knowledge. If a medical record is unavailable for coding the encounter is not billed and is not included in the data submission. This represents a rare event that is less than 1% of the encounter volume. Diagnosis and Procedures Patient diagnoses and procedures for a particular outpatient hospital stay are coded by the hospital using a universal standard called the International Classification of Disease (ICD-9-CM) and Current Procedural Terminology Codes (CPT Codes). This is mandated by the federal government. The hospital complies with the guidelines for assigning these diagnosis codes; however, this is often driven by physician's subjective criteria for defining a diagnosis. For example, while one physician may diagnose a patient with anemia when the patient's blood hemoglobin level falls below 9.5, another physician may not diagnose the patient with anemia until their blood hemoglobin level is below 9.0. In both situations, a diagnosis of anemia is correctly assigned, but the criteria used by the physician to determine that diagnosis was different. An apples to apples comparison cannot be made, which makes it difficult to obtain an accurate comparison of hospital or physician performance.

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PROVIDER: Dodson Surgery Center THCIC ID: 970400 QUARTER: 4 YEAR: 2015

Certified With Comments

Cook Children's Medical Center has submitted and certified 4th QUARTER 2015 inpatient, outpatient surgery and outpatient radiology encounters to the Texas Health Care Information Council with the following possible data concerns based on the required submission method.

Since our data was submitted to the State we have uncovered medical coding errors regarding the following patient conditions in 2005 and 2010 discharges:

Post-operative infections Accidental puncture and lacerations Post-operative wound dehiscence Post-operative hemorrhage and hematoma

Comparative complication reports reflecting the above conditions could misstate the true conditions at Cook Children's Medical Center for the 4th QUARTER OF 2015.

Patient charges that were accrued before admit or after discharge were systematically excluded from the database. This can happen when a patient is pre-admitted and incurs charges to their encounter before their admit date or charges are discovered and added to the patient encounter after they are discharged. Therefore, the charges for many patient encounters are under reported. Outpatient Facility Comments, 4Q2015.txt The data structure allowed by THCIC erroneously assigns surgeons to surgical procedures they did not perform. The data structure provided by THCIC allows for one attending and one operating physician assignment. However, patients frequently undergo multiple surgeries where different physicians perform multiple procedures. Assigning all of those procedures to a single 'operating physician' will frequently attribute surgeries to the wrong physician. THCIC chooses to only assign one surgeon to a patient encounter, not to each procedure.

Furthermore, the data structure established by THCIC allows for a limited number of diagnoses and procedures. Patients with more than the limit for diagnoses or procedures will be missing information from the database. This is especially true in complex cases where a patient has multiple major illnesses and multiple surgeries over an extended stay.

PROVIDER: Huguley Surgery Center THCIC ID: 971500 QUARTER: 4 YEAR: 2015

Certified With Comments

The following comments reflect concerns, errors, or limitations of discharge data for THCIC mandatory reporting requirements as of June 1, 2016. If any errors are discovered in our data after this point, we will be unable to communicate these due to THCIC. This data is administrative data, which hospitals collect for billing purposes, and not clinical data, from which you can make judgments about patient care.

## Submission Timing

The State requires us to submit a snapshot of billed claims, extracted from our database approximately 20 days following the close of the calendar year quarter. Any discharged patient encounters not billed by this cut-off date will not be included in the quarterly submission file sent in.

## Diagnosis and Procedures

The data submitted matches the state's reporting requirements but may be incomplete due to a limitation on the number of diagnoses and procedures the state allows us to include for each patient. In other words, the state's data file may not fully represent all diagnoses treated by the hospital or all procedures performed which can alter the true picture of a patient's hospitalization, sometimes significantly.

Patient diagnoses and procedures for a particular hospital stay are coded by the hospital using ICD-10-CM effective 10-1-2015 and CPT. This is mandated by the federal government and all hospitals must comply. The codes are assigned based on documentation in the patient's chart and are used by hospitals for billing purposes. The hospital can code as many as 25 diagnoses and 25 procedures for each patient record. One limitation of using the ICD-10-CM and CPT is that there does not exist a code for every possible diagnosis and procedure due to the continued evolution of medicine; new codes are added yearly as coding manuals are updated.

There is no mechanism provided in the reporting process to factor in DNR (Do Not Resuscitate) patients. Any mortalities occurring to a DNR patient are not recognized separately; therefore mortality ratios may be accurate for reporting standards but overstated.

Given the current certification software, due to hospital volumes, it is not feasible to perform encounter level audits and edits. To meet the state's mandates to submit hospital Outpatient visits with specific procedures, Texas Outpatient Facility Comments, 4Q2015.txt Health Huguley underwent a major program conversion to the HCFA 837 EDI electronic claim format.

The quarterly data to the best of our knowledge is accurate and complete given the above.

PROVIDER: Baylor Scott & White Medical Center McKinney
THCIC ID: 971900
QUARTER: 4
YEAR: 2015

Certified With Comments

Due to the sheer volume of OP data, we have limited resources as a hospital to analyze the data. Regarding the mandate to communicate the Certification reports to physicians The State does not offer a secure mechanism for us to communicate other than the hard copy reports. At this time, we as a hospital are moving to limit or eliminate paper distribution and we do not have an internal system to communicate to all physicians feasibly.

Quality Trending of data over a few years is important to define outcome and quality. A small sampling of data (i.e. one year) does not explain outcome.

We recommend the Patient communicate with the Hospital and the Physician regarding data. Patient and physician preference contributes to the care rendered to the patient and the data does not always reflect this.

Patients and physicians consider many factors when making health care decisions that are not available in administrative data. These include a patients preference for life-sustaining treatments, functional status, and other factors.

We support the Patient, Provider, and Payer and empowered, educated decision-making. Quality improvement is not new; it is an on-going commitment.

PROVIDER: Stonebridge Surgery Center THCIC ID: 972000 QUARTER: 4 YEAR: 2015

Certified With Comments

Upon reviewing the CO1: Certification Summary it was noticed that the Patient Race for Race 1 American Indian is incorrect. All listed for Race 1 should have been Race 4, but due to an issue with our system they were reported wrong. It is 07/28/16 and the cutoff for corrections was 07/15/16 so we can't correct the error, but are certifying with an explanation.

PROVIDER: Texas Health Harris Methodist Hospital Alliance THCIC ID: 972900 QUARTER: 4 YEAR: 2015 Certified with Comments THCIC ID: TH972900

Outpatient Facility Comments, 4Q2015.txt QUARTER: 2015 Quarter 4 Outpatient Texas Health Alliance CERTIFIED WITH COMMENTS Data Content This data is administrative data, which hospitals collect for billing purposes. Administrative data may not accurately represent the clinical details of an encounter. The state requires us to submit outpatient claims for patients that receive outpatient surgical or radiological services, by quarter year, gathered from a form called an UB92, in a standard government format called HCFA 837 EDI electronic claim format. Then the state specifications require additional data elements to be included over and above that. Adding those additional data places programming burdens on the hospital since it is over and above the actual hospital billing process. Errors can occur due to this additional programming, but the public should not conclude that billing data sent to our payers is inaccurate. These errors have been corrected to the best of our knowledge. If a medical record is unavailable for coding the encounter is not billed and is not included in the data submission. This represents a rare event that is less than 1% of the encounter volume. Diagnosis and Procedures Patient diagnoses and procedures for a particular outpatient hospital stay are coded by the hospital using a universal standard called the International Classification of Disease (ICD-9-CM) and Current Procedural Terminology Codes (CPT Codes). This is mandated by the federal government. The hospital complies with the guidelines for assigning these diagnosis codes; however, this is often driven by physician' subjective criteria for defining a diagnosis. For example, while one physician may diagnose a patient with anemia when the patient's blood hemoglobin level falls below 9.5, another physician may not diagnose the patient with anemia until their blood hemoglobin level is below 9.0. In both situations, a diagnosis of anemia is correctly assigned, but the criteria used by the physician to determine that diagnosis was different. An apples to apples comparison cannot be made, which makes it difficult to obtain an accurate comparison of hospital or physician performance. The codes also do not distinguish between conditions present at the time of the patient's admission to the hospital and those occurring during hospitalization. For example, if a code indicating an infection is made, it is not always possible to determine if the patient had an infection prior to admission, or developed an infection during their hospitalization. This makes it difficult to obtain accurate information regarding things such as complication rates.

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Outpatient Facility Comments, 4Q2015.txt payers identified contractually as both HMO, and PPO are categorized as Commercial PPO. Thus any true managed care comparisons by contract type (HMO vs. PPO) may result in inaccurate analysis. Cost/ Revenue Codes The state requires that hospitals submit revenue information including charges. It is important to note that charges are not equal to actual payments received by the hospital or hospital cost for performing the service. Typically actual payments are much less than charges due to managed care-negotiated discounts and denial of payment by insurance companies. Charges also do not reflect the actual cost to deliver the care that each patient needs.

PROVIDER: Vivere Austin Surgery Center THCIC ID: 973270 QUARTER: 4 YEAR: 2015 Certified With Comments

Error E-625 is a same sex couple. Record has been reported correctly.

PROVIDER: Baylor Surgery Center of Waxahachie THCIC ID: 973560 QUARTER: 4 YEAR: 2015

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Certified With Comments

Due to the sheer volume of OP data, we have limited resources as a hospital to analyze the data. Regarding the mandate to communicate the Certification reports to physicians The State does not offer a secure mechanism for us to communicate other than the hard copy reports. At this time, we as a hospital are moving to limit or eliminate paper distribution and we do not have an internal system to communicate to all physicians feasibly.

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We recommend the Patient communicate with the Hospital and the Physician regarding data. Patient and physician preference contributes to the care rendered to the patient and the data does not always reflect this.

Patients and physicians consider many factors when making health care decisions that are not available in administrative data. These include a patients preference for life-sustaining treatments, functional status, and other factors.

We support the Patient, Provider, and Payer and empowered, educated decision-making. Quality improvement is not new; it is an on-going commitment.

Outpatient Facility Comments, 4Q2015.txt PROVIDER: Walnut Hill Medical Center THCIC ID: 973750 QUARTER: 4 YEAR: 2015 Certified With Comments No changes to be made. PROVIDER: Parkway Surgical and Cardiovascular Hospital THCIC ID: 973840 QUARTER: 4 YEAR: 2015 Certified With Comments The data for 4Q2015 is being certified with comment. All reported data is accurate and correct at the specific point in time that the data files are generated. Information is subject to change after files are generated and submitted to THCIC; any changes would be information collected or updated during the normal course of business. PROVIDER: Magna Surgery Center THCIC ID: 973950 QUARTER: 4 YEAR: 2015 Certified With Comments 4th Quarter 2015 Outpatient Data Certification \_\_\_\_\_ PROVIDER: Baylor Heart and Vascular Hospital of Fort Worth THCIC ID: 974240 QUARTER: 4 YEAR: 2015 Certified With Comments Due to the sheer volume of OP data, we have limited resources as a hospital to analyze the data. Regarding the mandate to communicate the Certification reports to physicians The State does not offer a secure mechanism for us to communicate other than the hard copy reports. At this time, we as a hospital are moving to limit or eliminate paper distribution and we do not have an internal system to communicate to all physicians feasibly.

Quality Trending of data over a few years is important to define outcome and quality. A small sampling of data (i.e. one year) does not explain outcome.

we recommend the Patient communicate with the Hospital and the Physician regarding data. Patient and physician preference contributes to the care rendered to the patient and the data does not always reflect this.

Patients and physicians consider many factors when making health care decisions that are not available in administrative data. These include a patients preference for life-sustaining treatments, functional status, and other factors.

Outpatient Facility Comments, 4Q2015.txt We support the Patient, Provider, and Payer and empowered, educated decision-making. Quality improvement is not new; it is an on-going commitment.

PROVIDER: Binz Surgery Center THCIC ID: 974580 QUARTER: 4 YEAR: 2015 Certified With Comments I have cleared all errors, there is an issue with our system collecting all the data for principal codes. Will be working with Source Med to resolove issues. PROVIDER: Planned Parenthood South Texas Surgical Center THCIC ID: 974780 QUARTER: 4 YEAR: 2015 Certified With Comments Data Inadvertently submitted without physician. PROVIDER: Baylor St Lukes Medical Center McNair Endoscopy THCIC ID: 974790 QUARTER: 4 YEAR: 2015 Certified With Comments The data reports for Quarter 4, 2015 do not accurately reflect patient volume or severity. Patient Volume Data reflects administrative claims data (Uniform Billing data elements) that are a snapshot of claims that have been billed prior to the reporting deadline. If the encounter has not yet been billed, data will not be reflected in this quarter. Severity Not all clinically significant conditions, such as the hearts ejection fraction, can be captured and reflected in the various billing data elements including the ICD-9-CM diagnosis coding system. As a result, the true clinical picture of the patient population cannot be adequately demonstrated using admissions and billing data. Payer Source A payer source mapping discrepancy has been identified. The HIS vendor is working towards a resolution. \_\_\_\_\_ \_\_\_\_\_ PROVIDER: Elite Minimally Invasive Surgery of Oakbend Health System THCIC ID: 974860 QUARTER: 4 YEAR: 2015

Certified With Comments

This Center was new for State Reporting in Q3. There are some Q3 claims in the Q4 data

PROVIDER: Doctors Hospital at Renaissance Outpatient Surgical Center THCIC ID: 974950 QUARTER: 4 YEAR: 2015

Certified With Comments

Doctors Hospital at Renaissance Outpatient Surgical Center started reporting seperately therefore there will be a difference in the Doctors Hospital-Renaissance Outpatient services.

PROVIDER: CHI St Lukes Health Baylor Medical Center ASC THCIC ID: 974960 QUARTER: 4 YEAR: 2015

Certified With Comments

The data reports for Quarter 4, 2015 do not accurately reflect patient volume or severity.

Patient Volume

Data reflects administrative claims data (Uniform Billing data elements) that are a snapshot of claims that have been billed prior to the reporting deadline. If the encounter has not yet been billed, data will not be reflected in this quarter.

Severity

Not all clinically significant conditions, such as the hearts ejection fraction, can be captured and reflected in the various billing data elements including the ICD-9-CM diagnosis coding system. As a result, the true clinical picture of the patient population cannot be adequately demonstrated using admissions and billing data.

Payer Source

A payer source mapping discrepancy has been identified. The HIS vendor is working towards a resolution.

PROVIDER: Cumberland Surgical Hospital THCIC ID: 974980 QUARTER: 4 YEAR: 2015 Certified With Comments Certified without comments

PROVIDER: Our Childrens House THCIC ID: 975010 QUARTER: 4 YEAR: 2015 Certified With Comments Certify without comments PROVIDER: Medical Center of Southeast Texas Victory Campus THCIC ID: 975111 QUARTER: 4 YEAR: 2015

Certified With Comments

Certifying data as is.