

JAI MEDICAL SYSTEMS
MANAGED CARE ORGANIZATION, INC.

QUALITY ASSURANCE PROGRAM DESCRIPTION

2021

Quality Assurance Program

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I. Quality Assurance Program Description

Please Note:

This program description was prepared in response to the requested pre-site documents for the EQRO Annual Systems Performance Review. The entirety of the 2021 Quality Assurance Program is located in the administrative offices of Jai Medical Systems. The Quality Assurance Program includes, but is not limited to the Utilization Review Plan, Credentialing/Recredentialing Plan, Availability & Access, Enrollee Rights and Responsibilities, Continuity of Care (including Case Management and Disease Management Programs), Health Education Plan, and Outreach Plans. All of these documents are an integral part of the Quality Assurance Program and were submitted in separate binders as part of the requested pre-site documents.

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A. ORIENTATION

Jai Medical Systems' Quality Assurance Program has been specifically designed to monitor, measure, evaluate, and improve the quality of health care that Jai Medical Systems' members receive. Jai Medical Systems' Quality Assurance Program is in compliance with the guidelines of care specified in the Centers for Medicare and Medicaid Services (CMS) Health Care Quality Improvement System.

The Quality Assurance Program is centered around Jai Medical Systems' internal Quality Assurance Plan and relies on the active participation of several entities including Medicaid recipients, Quality Assurance Committee, Health Care Providers, the State's Maryland Department of Health, and CMS. The goal of the Jai Medical Systems Quality Assurance Program is to maximize the quality of health care Jai Medical Systems delivers to its members. Jai Medical Systems defines Quality Assurance and its vision below:

Definition: Jai Medical Systems defines Quality Assurance as a continuous process designed to:

- Monitor and evaluate the adequacy and appropriateness of health care and administrative services;
- Pursue opportunities to assure and/or improve health outcomes and member satisfaction.

Vision: Jai Medical Systems' Quality Assurance Program is designed to promote and facilitate maintenance of good health and a sense of well-being to its members by rendering superior quality health care to the sick and those in need of diagnostic services and/or other treatment modalities.

What follows is a detailed description of Jai Medical Systems' current Quality Assurance Program which was developed by Jai Medical Systems' Quality Assurance Committee and approved by Jai Medical Systems' Board of Directors through the signature of the Executive Medical Director, Hollis Seunarine, M.D. The Program is reviewed and updated on an annual basis. It includes the major features addressed in the CMS Health Care Quality Improvement System document, i.e.:

1. Ensuring that the process of quality assessment and improvement is systematic;
2. Addressing the accountability and supervision of the Quality Assurance Committee by the Board of Directors;
3. Describing the structure and process of an active Quality Assurance Committee;
4. Ensuring the provision of adequate staffing and material resources to the active Quality Assurance Committee;
5. Requiring active participation from Jai Medical Systems' health care providers on the Quality Assurance Committee;
6. Demonstrating the implementation responsibilities of various aspects of the Quality Assurance Program;
7. On-going credentialing and recredentialing processes;
8. Updated member rights and responsibilities policies and principles;
9. Updated policies regarding member availability of and access to health care;

10. Updated policies regarding standards for keeping medical records;
11. Utilization Management policies;
12. Ensuring the continuity of care across the life span and/or across disciplines at any point in time;
13. Procedures for coordination of Quality Assurance Activity with other management activities within Jai Medical Systems.

B. PURPOSE

The purpose of the Jai Medical Systems Quality Assurance Program is to provide a formal process for continuously and systematically monitoring and evaluating the adequacy and appropriateness of health care services, as well as administrative services rendered to the members of Jai Medical Systems. This pro-active process provides the mechanisms to study and review multifaceted components of managed health care, recommends changes when opportunities to improve are identified, incorporates recommended enhancements, and re-examines the components to assure improvements as a result of the process.

C. GOAL

The goal of the Quality Assurance Program is to ensure that the health care provided to members is of the highest possible quality. This goal is achieved through continuous, systematic monitoring, evaluation and improvement of all aspects of Jai Medical Systems' operations. Essential components of this goal include:

1. Complaint specific care and general well-member care;
2. Access to care;
3. Continuity and coordination of care;
4. Qualified providers of primary, specialty and tertiary care;
5. Appropriate support services and equipment;
6. All health care meets patient safety guidelines
7. Regular quality assessment.

D. OBJECTIVES

Jai Medical Systems' Quality Assurance objectives are designed to capture opportunities to improve member health status, patient safety, and services by:

1. Overseeing, monitoring, and reviewing the adequacy of health care delivery; and making recommendations to improve health and administrative services utilizing problem identification, analysis, and resolution processes. This process includes, but is not limited to: medical record review, adverse outcomes, target diagnoses, case management, and member and provider satisfaction surveys;

2. Conducting provider credentialing and recredentialing and incorporating Quality Assurance data into the process to develop and promote quality provider networks. This will facilitate identifying those providers who do not meet minimum standards of Jai Medical Systems and will promote further improvement by all network providers;
3. Consistently monitoring guidelines in the pre-certification process. Guidelines are applied as tools to detect and prevent over/under utilization of health services;
4. Establishing common quality assurance and improvement goals and objectives for all departments within Jai Medical Systems, periodically monitoring attainment of goals, and developing action plans for improvement;
5. Maintaining the confidentiality of data relating to individual members and/or providers;
6. Promoting ongoing professional peer review of participating providers to assure maintenance of professional integrity, adherence to the standards of Jai Medical Systems, and the delivery of high quality health care;
7. Evaluating member satisfaction through the use of member satisfaction surveys;
8. Monitoring and reviewing the adequacy of health delivery; and continuing to improve health and administrative services utilizing problem identification, analysis, and resolution;
9. Monitoring compliance with utilization review and quality assurance regulations which may be established by local, state, or federal authorities;
10. Maintaining external accreditation and Maryland Department of Health (MDH) approval;
11. Initiating actions to study and address impact of problems/issues affecting Jai Medical Systems' members and providers;
12. Establishing, documenting, and updating standards of care after identifying specific health related needs. Monitoring compliance with Standards to promote improved quality of care;
13. Maintaining quality assurance oversight of delegated services;
14. Maintaining open lines of communication with providers, internal management areas linked to Quality Assurance, and MDH to facilitate the flow of quality assurance data. Data may be useful in improving health care and administrative services to members;
15. Communicating Quality Assurance Program expectations to members and providers after revision of current medical standards of care and/or development of additional standards of care;
16. Allocating adequate staff resources to the Quality Assurance Program to facilitate monitoring of clinical activity and administrative services;
17. Promoting and providing ongoing education for the Quality Assurance Committee members;
18. Utilizing internal and external resources to improve study design and analysis.
19. Increasing the cultural competency of staff and contracted providers and continuing to monitor member satisfaction with staff and provider cultural competency. Providing cultural competency training on request and when issues are identified.

Goals for the Coming Year

The following items have been identified as goals to focus on in 2021:

Quality Assurance

- ❖ Reach Incentive ranges in HEDIS 2021 – VBPI Measures
 - *Adolescent Well Care*
 - *Well Child Visits—First 15 Months*
 - *Breast Cancer Screening*
 - *Controlling High Blood Pressure*
 - *Asthma Medication Ratio*
 - *Lead Screening 12-23 months*
 - *SSI Adults*
 - *CDC – HbA1c control*
 - *SSI Children*
 - *Prenatal and Postpartum Care*

- ❖ By the end of 2nd quarter of 2021, to implement a program that supports members living with HIV/AIDS as well as network providers treating HIV/AIDS.

- ❖ Successfully vaccinate 100% of JMS membership with the COVID-19 vaccine.

Human Resources

- ❖ Conduct a review of the employee manual and complete any necessary edits in accordance with recent policy changes.

- ❖ Assess payroll and benefit processing procedures; partner with potential vendors to streamline.

- ❖ Evaluate and deploy a new security awareness training platform.

Customer Service

- ❖ Maintain a minimum of 15 specialized Customer Service Agents to improve call handle time, improve call effectiveness, reduce hold time and increase first call resolutions rates.

- ❖ Implement Customer Relationship Management Program that streamlines work processes to improve workflow, call effectiveness and reduce call handle time.

- ❖ Improve the quality of the hold music for internal and external call types.

Production

- ❖ Increase in-house production to reduce costs of production by 5%.

- ❖ Improve processing timeframe for appeals within 5 day time-frame.

Systems Management

- ❖ Clean up AMISYS fee schedules and payclasses; reconcile all AMISYS fee schedules, not only to be sure they are in agreement with MDH fee schedules, but to “clean up” any unused codes and schedules. Reconcile all AMISYS payclasses to ensure that providers within each payclass are paid according to contract/fee schedule.
- ❖ Automate submission of provider data to MDH through eMedicaid to ensure our network is accurately represented in MMIS and the online searchable provider directory.
- ❖ Upgrade the Phone System to improve reporting and integrations with other systems such as AWD Customer Service.
- ❖ Implement an EMR solution for a contracted Jai Medical Center and train staff on how to use the system. Migrate to electronic charting ensuring continued success with Maryland Healthy Kids Audit.
- ❖ Implement a vaccine reporting and tracking program to include required reporting to Immunet. Outreach and encourage vaccination with targeted and appropriate lists. Follow-up with members for second doses as needed.

Utilization Management

- ❖ Improve discharge planning to reduce the percentage of members who are readmitted within 30 days after an inpatient stay by 2 percentage points.
- ❖ Decrease ER visits within 30 days after inpatient stay by 1 percentage point.
- ❖ Establish better communication between the Utilization Management Department and providers/hospitals by conducting onsite visits and enhancing telecommunication visiting at least 5 area hospitals and 5 Primary Care offices in 2021.

Provider Relations

- ❖ Turn on in Calvert County, Prince George’s County, and Montgomery County by the end of 2nd quarter 2021.
- ❖ Contract with 2 additional Acute Hospitals in the state of Maryland by the end of 3rd quarter 2021.
- ❖ Upgrade credentialing software program and credentialing filing system by end of the 4th quarter of 2021.

E. QUALITY ASSURANCE POLICY

General: It is Jai Medical Systems’ policy to support a pro-active Quality Assurance Program that systematically monitors and evaluates the quality and appropriateness of member services and that utilizes the information obtained to pursue opportunities to improve the quality of all services. The major thrust of the program is geared to the prevention of illness and disease, and to the clinical aspects of member care. Service issues, e.g., accessibility and availability of care, are also a program priority and are closely monitored.

Confidentiality: Documents created as part of the quality assurance process are confidential and are maintained in a manner that protects members' and providers' identities. Such paperwork is also in compliance with legal requirements, accrediting standards, and Jai Medical Systems' Confidentiality Policy. These documents include:

- Systematic internal review, including member care and peer review studies;
- Utilization Management studies including reports and recommendations;
- Reports/Minutes of Quality Assurance Committee, Subcommittees, and Task Forces.

Administrative processes are also covered by the Confidentiality Policy. Upon hire, Jai Medical Systems staff, clinical and administrative, sign a statement requiring adherence to Confidentiality Standards.

F. PATIENT SAFETY

Jai Medical Systems Managed Care Organization, Inc. is very concerned with protecting patient safety and has instituted many safeguards, including programs to prevent pharmaceutical interactions and duplications of therapy and pre-surgical reviews to prevent unnecessary procedures. Pharmacy DUR reports that are reported quarterly to the P&T Committee look at Pregnancy and Drugs with the Potential for Teratogenicity, Therapeutic Duplication, and Overutilization.

Pharmacy Drug Utilization Review Reports:

Pregnancy and Drugs with Potential for Teratogenicity DUR – HMG CoA Reductase Inhibitors, ACE Inhibitors, angiotensin receptor blockers (ARB's), and warfarin are known to potentially cause fetal harm, in some cases even death, when consumed by a pregnant woman. A DUR is conducted monthly, monitoring for pregnant patients receiving these agents concomitantly with prenatal vitamins. In these cases, the prescriber is contacted to verify that the member is pregnant and that the prescriber is aware of the potential for teratogenicity. The majority of the members identified in this review are confirmed to not be pregnant by their doctors and are taking prenatal vitamins because that is what their doctor prescribed.

Therapeutic Duplication DUR Program – The DUR department conducted an analysis of members receiving duplicate therapy for multiple medication classes. Classes were selected based on lack of information in manufacturer's recommendations, clinical literature and treatment protocols that supported combination therapy with multiple agents. The analysis identifies patients receiving duplicate agents within the same therapeutic class or treatment category. The classes include non-steroidal anti-inflammatory agents, COX-2 inhibitors, calcium channel blockers, lipid lowering agents, gastrointestinal agents, ACE inhibitors and angiotension receptor blockers. After consulting with the prescriber listed on the claims, most members were identified as transitioning to the second medication.

Overutilization DUR – The DUR department conducted an analysis for possible member overutilization of beta-agonist inhalers. Pharmacy claims data was analyzed to identify all patients receiving more than 3 beta-agonist inhalers without concomitant anti-inflammatory therapy.

Overutilization DUR – The Drug Utilization Review department conducted an analysis of members obtaining opioid medications from multiple pharmacies. Pharmacy claims data is analyzed on a quarterly basis to identify all patients receiving an opioid prescription from 2 or more pharmacies during the quarter. The notification letter is sent to each of the prescribing physicians and lists the following: drug name and strength, pharmacy, date(s) of service, and prescriber. This notification is intended to make sure that prescribers are aware of what medications their patients are filling so they can determine if there is a need to discuss potential risks of accidental overdose, abuse/addiction treatment services, along with risks and benefits of these medications with their patient.

According to the Drug Use Management Program report, this is the list of the types of prospective DUR alerts utilized by our MCO. The list indicates which alerts result in a claim denial, and whether MCO or PBM overrides the claim denial, if appropriate. Only drug-drug interaction, early refill, and quantity limits (including special ones for emergency contraceptives and glucometers) result in claims denials.

Type of Prospective DUR Alert	Utilized by MCO/PBM		Claim Denial		Claim Denial Override	
	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> MCO	<input checked="" type="checkbox"/> PBM
Drug-drug interaction	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> MCO	<input checked="" type="checkbox"/> PBM
Therapeutic duplication	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> MCO	<input type="checkbox"/> PBM
Drug-disease contraindication	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> MCO	<input type="checkbox"/> PBM
Drug-allergy interaction	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> MCO	<input type="checkbox"/> PBM
Early refill	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> MCO	<input checked="" type="checkbox"/> PBM
Late refill	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> MCO	<input type="checkbox"/> PBM
High dose	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> MCO	<input type="checkbox"/> PBM
Low dose	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> MCO	<input type="checkbox"/> PBM
Incorrect duration of drug treatment	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> MCO	<input type="checkbox"/> PBM
Other – Emergency Contraceptive prescriptions limited to 1 kit/month, 3 kits/year*	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> MCO	<input checked="" type="checkbox"/> PBM
Other – Blood Glucose Meters are limited to 1 device/year*	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> MCO	<input checked="" type="checkbox"/> PBM

Opioid Medication Policy Changes – Jai Medical Systems is partnering with the Department and the other MCOs to implement more stringent policies regarding prior authorizations for opioids to reduce the opioid-related deaths in Maryland. These new policies will be in place by July 1, 2017 and will require prescribers to attest to reviewing the patient's prescription history along with offering overdose prevention options and other counseling. The changes should help improve patient safety across the State.

Utilization Review:

All surgeries that require prior authorization must be approved from the Utilization Management Department. This process ensures that the surgery to be provided is medically necessary as well as that the member is medically cleared and approved by his or her Primary Care Physician before proceeding with the surgery. In addition, annual inter-rater reliability studies are

performed involving all personnel involved in medical reviews to ensure that medical necessity criteria is applied appropriately and consistently.

Additional Patient Safety Related Actions:

Most of the goals, objectives, and policies in the Quality Assurance Program will help ensure patient safety. For example, our credentialing policies are in place, not only to satisfy regulated guidelines, but to assist in the selection of competent practitioners who will follow accepted safe practices. The initial site review of all contracted primary care physicians also allows us to evaluate the office site and medical record keeping practices to ensure patient safety.

The tracking of potential quality issues, complaints, utilization of services, etc. helps the MCO evaluate the safety of care offered to our members. All of these efforts combined from each department create a plan for increased patient safety for the members enrolled in our health plan.

G. STRUCTURE

Oversight

The Board of Directors is ultimately responsible for overseeing the Quality Assurance Program, including quality of clinical and administrative services which are provided to members of Jai Medical Systems. The Board of Directors delegates to the Director of Quality Assurance and the Quality Assurance Committee the management of activities that monitor and assess the quality and appropriateness of administrative and clinical services provided through Jai Medical Systems. The Board of Directors delegates to the Delegation Committee the review of all delegated vendor activities, including the review of all quarterly and annual reports and documents from vendors. The Board of Directors delegates to the Physician Advisory SubCommittee all credentialing and recredentialing, hospital and ancillary provider contracting review of clinical guidelines, quality of care concerns, and provider appeals. The Board of Directors delegates to the Policy and Procedure SubCommittee the annual review or revision of policies and procedures. The Board of Directors delegates to the Fraud and Abuse Compliance Committee the internal monitoring of all suspected cases of fraud and abuse, as well as the education of staff, enrollees, and providers regarding federal, state, and internal fraud and abuse rules and regulations. The Board of Directors delegates to the Utilization Management Department quarterly review of over and under-utilization issues as well as trending statistics. The Board of Directors delegates to the Pharmacy and Therapeutics Committee the oversight of the Drug Use Management Program. Other delegated functions include formulary updates, the development of step therapy protocols, and evaluation of preferred product status proposals. The Board of Directors delegates to the Information Technology Integration Committee, the review, monitoring, and prioritization of projects to ensure alignment with business objectives. The Board of Directors delegates to the Information Technology Security Committee the security and recovery operations for Jai Medical Systems. The IT Security Committee is responsible for reviewing, monitoring, and accessing the security of the Information Technology department and Jai Medical Systems' facilities.

The Board of Directors is comprised of the following participants:

- Medical Director/President
- Assistant Medical Director

- CEO/Plan Administrator
- Chief Financial Officer
- Vice President

Committee Structure

Quality Assurance Committee

Jai Medical Systems' Quality Assurance Committee (QAC) is the main advisory body providing oversight of all activities that monitor and assess the quality and appropriateness of health care services provided with the ultimate goals of disease prevention, health maintenance, and improved member outcomes. The QAC has input in the development of tools for monitoring and evaluating health care services, selection and design of clinical studies, and subsequent evaluation of study results with recommendations for improvement, member appeals, and will identify problems and seek alternative solutions to improve all existing services.

Delegation Oversight Committee

This subcommittee of the QAC focuses on overseeing the performance and activities delegated to our vendors. The Committee will review all aspects of the customer service related functions, along with the quality assurance functions, delegated to these vendors. The Committee will also ensure the Quarterly UM Committee receives the information needed to review the UM criteria annually and the UM process on an annual basis. Additionally, the Committee will ensure the PASC has the credentialing information needed for a semi-annual review of delegated credentialing activities, and the Fraud and Abuse Compliance Committee has all needed information for a quarterly review of suspected fraud cases. The Quarterly Assurance Committee will oversee applicable reviews by the Quarterly Utilization Management (UM) Committee, the Physician Advisory Subcommittee (PASC), and the Fraud and Abuse Compliance Committee, as appropriate. The Committee will report all of its activities and findings to the Quality Assurance Committee (QAC), which in turn reports to the Board of Directors (BOD).

Physician Advisory Subcommittee

Jai Medical Systems' Physician Advisory Subcommittee (PASC) functions primarily in the peer review process. Jai Medical Systems' physicians provide input into physician credentialing and recredentialing, hospital and ancillary provider contracting, review of clinical protocols, quality of care concerns, and provider appeals. Members of the PASC may be actively involved in the medical record review process; function as Jai Medical Systems' consultants in their specialty; and participate with service educational programs.

Policy and Procedure Subcommittee

Jai Medical Systems' Policy and Procedure Subcommittee functions primarily in the annual review of policies and procedures. Executive management personnel review policies and procedures to ensure compliance with State and Federal standards and regulations. All significant additions and revisions to policies and procedures are included in an Annual Report that is presented to the Board of Directors for approval.

Pharmacy and Therapeutics Committee

The Jai Medical Systems Pharmacy and Therapeutics Committee (P&T Committee) is responsible for the development, evaluation, implementation and maintenance of the formulary and the Drug Use Management Program. The function of the P&T Committee includes the evaluation of proposed product additions and deletions, the development step therapy protocols, and the evaluation of preferred product status proposals utilizing peer reviewed medical preferences, primary research, and medical standards of practice. Decisions may be based upon information or recommendations provided by our pharmacy vendor's Formulary Committee regarding drug-specific parameters, including side effect profiles, pharmacodynamics, pharmacokinetics, and cost effectiveness.

The P&T Committee also evaluates the prospective and retrospective DUR criteria on an annual basis. The P&T Committee's decisions regarding the criteria used may be based on recommendations provided by our pharmacy vendor, as well as the State of Maryland's Department of Health.

Fraud and Abuse Compliance Committee

The Jai Medical Systems' Fraud and Abuse Compliance Committee (Compliance Committee) plays an integral role in seeking out potential and/or suspected fraud and abuse in areas including, but not limited to, encounter data, claims submission, claims processing, billing procedures, underutilization, overutilization, customer service, enrollment and disenrollment, and marketing. The Compliance Committee is also responsible for the appropriate annual fraud and abuse education of Jai Medical Systems staff, enrollees, and providers. Additionally, the Compliance Committee ensures adherence with state and federal regulations as well as internal policies and procedures concerning fraud and abuse.

Quarterly Utilization Management Committee

The Utilization Management Department began holding quarterly meetings in April 2005 in addition to their weekly Utilization Management meetings. These quarterly meetings focus primarily on issues of over and underutilization as well as trending statistics. As over and underutilization issues permeate all disciplines within Jai Medical Systems, guest speakers from within other departments are invited, as necessary, to address specific subjects.

The Information Technology Integration Committee

IT Integration Committee reviews, monitors and prioritizes major IT projects from a cross-functional perspective. The purpose of the IT Integration Committee is to assist with IT project prioritization, change management approval, and IT strategic planning. This Committee should help us realize better IT project priority setting, as well as, improved alignment with business objectives.

The Information Technology Security Committee

IT Security Committee reviews, monitors and assesses Jai Medical Systems' facilities and its security footing, with particular focus on the Information Technology department. The purpose of the IT Security Committee is to direct and control risk assessments and mitigation including: organizational security, network and storage security, physical assess controls, business continuity planning and disaster recovery. This Committee will

help us realize enhanced organizational security and recovery operations.

Operational Audit Committee

The primary purpose of the Audit Committee is to assist the Board of Directors in fulfilling its oversight responsibilities by reviewing the operational processes and systems of internal controls of Jai Medical Systems Managed Care Organization, Inc. Consistent with this function, the Audit Committee should encourage continuous improvement of, and should foster adherence to Jai Medical Systems' policies, procedures and practices at all levels.

Membership

Quality Assurance Committee

Jai Medical Systems' Quality Assurance Committee (QAC) is composed of representatives of all functions integral to the operations of Jai Medical Systems, i.e., health care providers and administrative staff (including subcontractors).

The QAC is comprised of the following participants:

- Medical Director of Quality Assurance
- Executive Medical Director / President
- Vice-President
- Plan Administrator / CEO
- Assistant Medical Director
- Chief Operating Officer
- Chief Financial Officer
- Chief Information Officer
- Director of Quality Assurance Administration
- Director of Regulatory Compliance & Administration
- Director of Systems Management
- Director of Provider Relations
- Director of Customer Service
- Marketing Manager
- Special Needs Coordinator
- Substance Abuse Coordinator
- Utilization Review Specialists
- Case Managers
- Data Analysts
- Quality Assurance Specialists
- Customer Service Representatives
- Account Executives
- Administrative Staff
- Officer Managers
- Pharmacy Benefits Manager
- PASC Representative
- Laboratory Representative
- Certified Medical Assistance
- Representatives from contracted hospitals
- Representatives from contracted specialty network
- Home Health Care Representative
- Representatives from other subcontractors

Physician Advisory SubCommittee

The Physician Advisory SubCommittee (PASC) is composed of Jai Medical Systems physicians representing major clinical specialties and representatives from Jai Medical Systems' internal departments which are directly involved in healthcare delivery services. The term for physician representatives is rotational (minimum 2 years); administrative members serve on a permanent basis.

The PASC is comprised of the following participants:

- Executive Medical Director
- Jai Medical Systems Physicians (Representatives for primary care and specialties)
- Director of Provider Relations
- Chief Operating Officer

Policy and Procedure SubCommittee

The Policy and Procedure SubCommittee is composed of Jai Medical Systems' executive management team representing internal departments which are directly involved with compliance to State, Federal, and NCQA standards and regulations. Departmental Directors are often solicited or invited to SubCommittee meetings when policies and procedures pertaining to their department are under review. The Substance Abuse Coordinator is asked to review any pertinent policies and submit any suggestions or edits to the Policy and Procedure SubCommittee at least annually.

The Policy and Procedure SubCommittee is comprised of members of senior management, including the Chief Executive Officer and the HIPAA Compliance Officer.

Pharmacy and Therapeutics Committee

The Pharmacy and Therapeutics (P&T) Committee is composed of physician practitioners, Pharm.D.s, registered pharmacists, and members of the Board of Directors.

The P&T Committee is comprised of the following participants:

- Executive Medical Director
- No less than three physician practitioners
- No less than one Pharm. D. or RPh.

Fraud and Abuse Compliance Committee

The Fraud and Abuse Compliance Committee is composed of Jai Medical Systems' executive management team representing internal departments which are directly involved with the compliance of State and Federal standards and regulations concerning fraud and abuse. As necessary, Departmental Directors, administrative staff, providers, etc., are invited to attend Compliance Committee meetings.

The Fraud and Abuse Compliance Committee is comprised of the following participants:

- The Compliance Officer;
- The head or designee of the Customer Service Department;
- The head or designee of the Provider Relations Department;
- A budgetary official.

Quarterly Utilization Management Committee

The quarterly meetings of the Utilization Management Department are composed of Jai Medical Systems' executive management team representing internal departments which are directly involved with the monitoring and review of issues of over and under-utilization and trending statistics. Guest speakers from within other departments are invited, as necessary, to address specific subjects.

The Utilization Management Department Quarterly Meeting is comprised of the following participants:

- UR Physician Advisor
- Substance Abuse Coordinator
- Director, Utilization Management
- Director, Case Management
- Chief Operating Officer
- UR/CM Staff

The Delegation Committee

Membership will consist of the Chief Operating Officer, the Director of Quality Assurance, the Director of Regulatory Compliance, the Director of Customer Service, the Director of Utilization Management, the Director of Systems Management, and the Provider Relations Liaisons to the vision and dental vendors. Representatives from any of the vendors, or other staff, may be invited on an as needed basis. This multi-disciplinary group will be able to appropriately assess all types of reports.

The Information Technology Integration Committee

The Information Technology Integration Committee is composed of Jai Medical Systems executive management team and members of the Board of Directors.

The IT Integration Committee Quarterly Meeting is comprised of the following participants:

- Chief Information Officer, Chair
- Chief Executive Officer, Advisor
- Chief Operating Officer, Member
- Director of Systems Management, Member
- Director of Management and Strategic Planning, Member
- Director of Regulatory Compliance, Member
- Director of Customer Service, Member
- Director of Provider Relations, Member
- Director of Human Resources, Member
- Director of Utilization Management, Member
- Project Manager, Scribe

The Information Technology Security Committee

The Information Technology Security Committee is comprised of the following participants:

- Chief Information Officer, Chair
- Chief Executive Officer, Advisor
- Systems and Network Administrator, Member

Operational Audit Committee

The Operational Audit Committee shall be comprised of four or more senior managers from Jai Medical Systems operations, as determined by the Board.

The members of the Committee shall be elected by the Board annually or until their successors shall be duly elected qualified. Unless a Chair is elected by the full Board, the members of the Committee may designate a Chair by majority vote of the full Committee membership.

Meetings

The Board of Directors, the Pharmacy and Therapeutics Committee, the QAC, the Delegation Committee, and the Quarterly Utilization Management Committee will meet at least quarterly. The PASC, the IT Integration Committee, and the IT Security Committee will meet at least four times a year. The Policy and Procedure Subcommittee will meet at least annually, or as needed. The Fraud and Abuse Compliance Committee will meet at least four times a year and additionally, if needed, as suspected cases of fraud and abuse arise and require review and investigation. The Audit Committee shall meet at least four times annually, or more frequently as circumstance dictate.

Documentation (Minutes/Reports)

Minutes of all Committee and Subcommittee meetings are recorded by the designated staff personnel and maintained in a separate, secure, and confidential file housed in Jai Medical Systems' administrative office.

Quarterly reports summarizing the activities, findings, recommendations, and actions are produced by the Quality Assurance Committee. These reports are given to committee members and a copy is forwarded to MDH as required.

Copies of meeting minutes, quarterly reports, and/or annual reports which include the Committee's activities, findings, recommendations, and actions are forwarded to members of the Board of Directors.

Monitoring and Evaluation

Ongoing monitoring and evaluation is designed to evaluate all aspects of care and administrative services, with particular emphasis on preventive health care and services. Quality Assurance activities are ongoing, planned, and systematic. Preventive care studies and focused reviews follow this format:

1. Identify targeted clinical condition or health service delivery issue.
2. Evaluate the care delivered for the targeted clinical condition or delivery issue based on clinical care standards/practice guidelines.
3. Screen and monitor care or services delivered using quality indicators derived from the clinical care standards/practice guidelines.

In order to perform proper oversight responsibilities, the Board of Directors requires that the Quality Assurance Director, in association with the QAC, submit evidence that the quality assurance functions specified in the Jai Medical Systems Quality Assurance Plan are taking

place. The goal of these reporting requirements is to ensure that all aspects associated with the delivery of comprehensive quality care are monitored on a regular ongoing basis.

The following is a list of the required reporting elements.

1. Quarterly report on progress or completion of all chart audits (which include, but are not limited to, sample size and demographic scope, purpose, aggregated data and analysis, summary of all findings, and recommendations on corrective actions, if necessary);
2. Report on provider and member satisfaction surveys, at least annually;
3. Quarterly report on utilization trends (which include, but are not limited to evidence that all claims data collected in the previous quarter, has been analyzed, reviewed, and compared to national standards or previous claims experience, to detect over and underutilization);
4. Quarterly summary of all member complaints or grievances;
5. Quarterly summary of all provider complaints or grievances;
6. Report on subcontractor oversight, at least annually (which include, but are not limited to, degree to which all subcontractors comply with contract terms and performance specifications);
7. Quarterly review of any activity of the Fraud and Abuse Compliance Committee.
8. Quarterly submission of all QAC minutes for review.

The aforementioned reports must be available no later than fifteen business days following the end of each quarter. Please note that this list is subject to change (*Please see Jai Medical Systems' Reporting Requirements Policy and Procedure for a comprehensive list of reporting requirements*).

The activities of all subcontractors involved in Jai Medical Systems' managed care delivery system are closely monitored. Jai Medical Systems closely monitors the quality of healthcare delivered by its physicians by use of the following:

1. Annual member satisfaction surveys;
2. Periodic assessment of complaints (number of complaints and type);
3. Periodic review of utilization patterns;
4. Site visits to assess EPSDT records, medical records, cleanliness of office, wait time of members for scheduled appointments, etc.

All other subcontractors, e.g., SS&C (*formerly DST*), Inc., ProCare (*formerly BioScrip*), Superior Vision/Versant Health (*formerly Block Vision*), DentaQuest, and other ancillary service providers, are required to submit quarterly and end of year summary reports to executive management which include, but are not limited to, the following information:

1. Member demographic information;
2. Type of service provided;
3. Date(s) of service;
4. Outcome.

All monitoring reports and information are forwarded to Jai Medical Systems' staff member responsible for overseeing the individual contract. The staff member reviews the information with the Medical Director and executive management. If it is determined that the services of a subcontractor do not meet the standards of Jai Medical Systems, the Physician Advisory SubCommittee will determine what necessary quality assurance corrective action(s) should be taken.

H. RESPONSIBILITY AND ACCOUNTABILITY

Members of the QAC are responsible for informing their staff members of Quality Assurance activities, coordinating the Quality Assurance activities within their areas of responsibility and coordinating Quality Assurance activities with other departments. This coordination includes the identification of continuous monitors, focused reviews, and identification and improvement within their department/area of responsibility. The QAC will assist other departments/areas within Jai Medical Systems on improving activities that may impact both departments/areas. Commitment and active involvement of all employees of Jai Medical Systems in the Quality Assurance Program is essential to its success. Jai Medical Systems remains accountable for all Quality Assurance Plan functions, even when certain functions are delegated to other entities.

In addition to the responsibilities of the Quality Assurance Committee and its Subcommittees, the following Jai Medical Systems staff/departments are responsible for major quality assurance activities:

BOARD OF DIRECTORS

- Has the ultimate responsibility and authority to ensure that a Quality Assurance Program is established, maintained, and supported by all Jai Medical Systems staff and providers on a continuous basis;
- Ensures the legal constitution of Jai Medical Systems;
- Maintains responsibility and accountability for ensuring that the Jai Medical Systems QA Program reflects the Maryland Medicaid Managed Care Program (HealthChoice) priorities;
- Oversees any revisions and/or additions to policies and procedures as set forth by the Policy and Procedure Subcommittee to ensure the quality of care;
- Reviews, approves, modifies, and implements QA recommendations, as appropriate;
- Ensures the QA Program is evaluated and, if necessary, revised at least annually;
- Supervises the identification and resolution of problems in all departments within Jai Medical Systems;
- Maintains responsibility for the overall effectiveness of the QA Program;
- Maintains responsibility for the quality and effectiveness of clinical services provided by Jai Medical Systems;
- Supervises the identification of problems and QA activities;
- Promotes identification and monitoring of over/under utilization as an integral part of preventive care studies, focused reviews, and medical record audits;
- Maintains recorded minutes of all meetings and actions taken to validate the performance of Jai Medical Systems;

- Ensures that physician and member confidentiality are maintained in all recorded minutes.

EXECUTIVE MEDICAL DIRECTOR / PRESIDENT (*Hollis Seunarine, M.D.*)

- Monitors quality assurance, utilization review, and risk management activities;
- Monitors and evaluates physicians and allied health care professionals;
- Develops policies and procedures to maintain high professional standards;
- Ensures communication within Jai Medical Systems;
- Executes short- and long-term planning for expansion and improvements in technology and equipment in coordination with the administrator;
- Provides oversight of Jai Medical Systems' educational programs;
- Recruits, selects, and retains physicians;
- Schedules physicians;
- Acts as liaison with outside groups and organizations;
- Negotiates contracts;
- Responds to member surveys and member grievances;
- Monitors marketing activities;
- Monitors and oversees Utilities Management activities;
- Maintains responsibility for the clinical activities of Jai Medical Systems;
- Ensures that all physicians and licensed personnel are qualified based on education, training, and experience;
- Delegates peer review of primary care physician and specialty care physician medical records to same specialty physician reviewer;
- Reviews credentialing and recredentialing files and makes recommendations to the Physician Advisory SubCommittee;
- Has overall responsibility for counseling and educating quality outliers, especially during the medical record review and recredentialing processes and other times, as may be necessary to maintain Jai Medical Systems' standards of care and services;
- Encourages all personnel to maintain a current level of competence through continuing education.

In the event of the Executive Medical Director / President's absence, the Assistant Medical Director or other qualified medical professional as specified by the Chief Executive Officer will be designated as the Executive Medical Director's temporary replacement.

ASSISTANT MEDICAL DIRECTOR (*Aye Lwin, M.D.*)

- Assists the Executive Medical Director in performing his/her functions as necessary;
- Assumes all of the responsibilities and duties of the Executive Medical Director in the event of his/her absence;
- Assists the Medical Director in the review of Utilization Management Appeals and Denials;

- Reviews and modifies treatment protocols in order to reflect current medical practice;
- Makes recommendations on Quality of Care Studies based on direct clinical experience with Jai Medical Systems' members.

CHIEF EXECUTIVE OFFICER / PLAN ADMINISTRATOR (*Jai Mitra Seunarine*)

It is the Plan Administrator's responsibility to manage the daily operations of Jai Medical Systems. The Plan Administrator establishes policies and procedures to ensure:

- Appointment of administrative staff to oversee the daily operations of Jai Medical Systems;
- Enforcement of all health care policies established by the governing body;
- Adequate, qualified, and competent health care personnel to provide efficient delivery of services;
- Appropriate personnel practices consistent with applicable laws;
- Protection of material assets;
- Adequate communication and reporting to all personnel and professional staff;
- Adequate purchasing and distribution of equipment and supplies;
- Current written job descriptions for each category of employee;
- Annual performance-based evaluations of all personnel;
- Methods to evaluate member and provider satisfaction/grievance;
- Maintenance of appropriate confidentiality of all medical records, contracts, and other business-related records.

QUALITY ASSURANCE DEPARTMENT (*Frances Bird, M.D., Medical Director*)

It is the Quality Assurance Director's responsibility to ensure, or to delegate, the following tasks as they relate to the Quality Assurance Plan:

- Provides the coordination and technical assistance necessary for an effective, comprehensive, and integrated QA Program;
- Coordinates QA activities to implement QA Program and Work Plan including surveys and focused reviews, continuous monitors, problem identification, and follow-up;
- Actively participates in QA educational programs each year to expand working knowledge of the QA process;
- Maintains QA oversight of delegated providers;
- Assists with development and revision of standards of care;
- Reviews reported guarded conditions (adverse outcomes) and target diagnoses and initiates necessary action;
- Develops drafts of policies and procedures for approval/recommendations of Jai Medical Systems' Policy and Procedure Subcommittee and the Board of Directors;
- Coordinates and participates in the Medical Record Review process; maintaining responsibility for verification of delivery of quality, accessible, preventive health care services;
- Oversees administrative Medical Record Review function of Provider Relations;
- Works closely with the Executive Medical Director in developing and implementing corrective action plans and addressing quality outliers noted in the Medical Record Review process;
- Coordinates QAC meetings;

- Attends quarterly Quality Assurance Liaison Committee meetings.

CASE MANAGEMENT & HEALTH SERVICES DEPARTMENT

Staff: 6 FTEs - 1 Director of Case Management, 1 Special Needs Coordinator, 5 Case Managers, 1 Support Person

Responsibilities:

- Completes a comprehensive health assessment of the member's physical, psychological, social, environmental, financial, and functional status. Assesses community, institutional, and family support systems and resources;
- Updates assessment materials through regular contact with members;
- Facilitates, organizes, and arranges for implementation of care plan;
- Educates members and providers on preventive health issues and clinical services;
- Interacts with Provider Relations and Customer Service to meet member and provider needs;
- Coordinates special needs and case management services for members;
- Links members with the most appropriate institutional and community resources, advocating on behalf of the member for scarce resources;
- Performs oversight of outsourced case management functions;
- Monitors sentinel conditions, target diagnoses and other quality of care processes and outcomes as needed, and reports to the Quality Assurance staff for follow up;
- Participates in the development of discharge planning for members who were involved in case management prior to admission or who meet Special Needs Population criteria as a result of admission;
- Coordinates and monitors services provided to members in case management who utilize School-Based Health Centers;
- Coordinates Jai Medical Systems' health education programs;
- Maintains contact with MDH and local health departments and provides appropriate reports and documentation as required;
- Appropriately maintains confidentiality of member, staff, and administrative information.

PROVIDER RELATIONS DEPARTMENT

Staff: 5 FTEs - 1 Provider Relations Director, 1 Credentialing Coordinator, 3 Support Persons

Responsibilities:

- Ensures that an adequate number of accessible and appropriately credentialed hospitals, physicians, and ancillary providers are contracted to provide high quality health care services and that overall access standards are met;
- Makes initial presentations to prospective network physicians and other providers;
- Carries out credentialing and recredentialing procedures under the guidance of the Physician Advisory SubCommittee;

- Maintains a current Provider Manual which includes documentation of QA Standards and HealthChoice Program requirements and distributes a copy to each participant in Jai Medical Systems' provider network;
- Informs physicians in writing of pertinent policy and procedure additions and revisions;
- Maintains periodic communication with each participating provider and staff;
- Resolves administrative and contractual problems with providers;
- Investigates and resolves provider concerns and complaint issues;
- Interacts with the Executive Medical Director, Customer Service Department, and other departments as necessary to address/resolve member complaints concerning providers;
- Maintains oversight of delegated credentialing and vendor compliance.

CUSTOMER SERVICE DEPARTMENT

Staff: 7 FTEs -1 Customer Service Director, 3 Customer Service Phone Representatives (1:2500), 2 Member Orientation/Outreach Representatives, 1 Health Educator (part-time), 1 Diabetes Educator (part-time).

Responsibilities:

- Responds to member questions and issues;
- Conducts annual member satisfaction surveys;
- Aggregates data and provides analysis and appropriate follow up to Member Satisfaction Surveys;
- Coordinates quarterly issues of member newsletter, *HealthBeat*;
- Reviews or revises the member handbook;
- Ensures compliance with submission of written and statistical reports;
- Continuously monitors access standards and quality improvement activities to ensure that members are receiving accessible and quality health care;
- Provides member education on how to access health care and services through welcome calls and proactive innovated methods;
- Coordinates and documents the member compliant process, as well as, the member grievance process for resolution and member satisfaction;
- Continuously monitors member rights to ensure Jai Medical Systems has demonstrated commitment to ensure members are afforded all rights;
- Interacts with Executive Medical Director, Provider Relations, etc. to address/resolve member complaints concerning provider and quality of care issues;
- Ensures member information is written in prose that is readable, easily understood, and is in the languages of the major population groups served;
- Interacts with external agencies to document and resolve member issues;
- Coordinates activities and annual reports of the Consumer Advisory Board;
- Provides outreach for members who are difficult to reach or are noncompliant;
- Coordinates and monitors health education programs for members;
- Conducts health fairs and other multi outreach community events;
- Acts as TCA Liaison for DSS;

- Provide other assistance as needed to advance the goals and objectives of Jai Medical Systems;
- Appropriately maintain confidentiality of enrollee, staff, and administrative information.

I. SCOPE/SPECIFIC ACTIVITIES

Jai Medical Systems' Quality Assurance Program is comprehensive, addressing the quality and safety of clinical care as well as non-clinical entities; i.e., accessibility, availability, continuity, and coordination of health care services. The quality assurance activities cover the spectrum of care, including various population subgroups, case settings (home, office, hospital), and type of care (preventive, primary, specialty, ancillary). The Program includes evaluation and improvement activities for all components of preventive health care, clinical care, and administrative services provided to members. All departments of Jai Medical Systems are involved in the Quality Assurance process.

Jai Medical Systems Managed Care Organization, Inc. does not cover Substance Abuse or Behavioral Health Services due to the fact that both of these services are not covered by Maryland Medicaid MCOs, and instead are carved out. Both Behavioral Health Services and Substance Abuse Services are provided by Optum Health. Optum Health is a separate vendor chosen by the State of Maryland.

J. SYSTEMATIC PROCESS OF QUALITY ASSESSMENT AND IMPROVEMENT

The effectiveness of Jai Medical Systems' Quality Assurance Plan is continually appraised through a systematic process in which the Quality Assurance Program objectively evaluates the quality of care and service Jai Medical Systems delivers to its members.

Jai Medical Systems' quality of care assessment process analyzes the quality of care that members receive through the use of Quality of Care (QOC) studies. QOC studies are detailed investigations into certain areas of health care services which are designed to evaluate the quality and appropriateness of care delivered by Jai Medical Systems. The objective of these studies is to identify areas of care which are in need of improvement and to determine methods to be applied to achieve improvement. The QOC studies performed by Jai Medical Systems are not random. They are conducted by reviewing information found in medical records, claims, administrative data, surveys, or other information resources.

Each QOC study focuses on specific areas of both clinical and/or service delivery and relies on the analysis of quality indicators. The first step undertaken in each study is the formulation of a clearly defined study question which identifies relevant issues of concern regarding the health care received by Jai Medical Systems' members. The area of delivery to be monitored and evaluated is determined by Jai Medical Systems' member population's demographic distribution in terms of age groups, disease categories, special risks, or special needs. The Maryland Department of Health may also determine areas of concern for Jai Medical Systems to address.

The Centers for Medicare and Medicaid Services (CMS) have provided examples of clinical areas of concern, including the following:

- | | |
|--|---|
| 1. Childhood Immunizations | 22. Otitis Media |
| 2. Pregnancy | 23. Mental Health |
| 3. Breast Cancer / Mammography | 24. Prescription Drug Abuse |
| 4. Cervical Cancer / Pap Smears | 25. Hip Fractures |
| 5. Lead Toxicity | 26. Cholesterol Screening and Management |
| 6. Comprehensive Well Child Periodic Health Assessment | 27. Treatment of Myocardial Infarctions |
| 7. HIV Status | 28. Prevention of Influenza |
| 8. Asthma | 29. Smoking Prevention and Cessation |
| 9. Hysterectomies | 30. Medical Problems of the Frail Elderly; e.g., incontinence and confusion |
| 10. Diabetes | 31. Hearing and Vision Screening and Services for Individuals Less Than 21 Years of Age |
| 11. ETOH and Other Substance Abuse | 32. Dental Screening and Services for Individuals Less Than 21 Years of Age |
| 12. Hypertension | 33. Domestic Violence |
| 13. Sexually Transmitted Diseases | |
| 14. Heritable Diseases | |
| 15. Coronary Artery Disease | |
| 16. Motor Vehicle Accidents | |
| 17. Pregnancy Prevention | |
| 18. Tuberculosis | |
| 19. Sickle Cell Anemia | |
| 20. Failure to Thrive | |
| 21. Hepatitis B | |

Examples of Health Services Delivery areas of concern include:

- | | |
|----------------------------|------------------------|
| 1. Access to care | 5. Health education |
| 2. Utilization of services | 6. Emergency services |
| 3. Coordination of care | 7. Membership services |
| 4. Continuity of care | |

The selected area of concern is quantified and analyzed by clinical indicators which are monitored and evaluated to answer the study question. The quality indicators are selected by Jai Medical Systems' Quality Assurance Department and must be objective, measurable, and based on current knowledge and clinical experience. The clinical indicators are information collected from medical records, claims, administrative data, surveys, or other information resources. After all the data has been collected from the selected clinical indicators, it is interpreted by Jai Medical Systems' Quality Assurance Committee and compared with accepted medical standards of care.

The standards of care that the Quality Assurance Committee uses for comparison will vary according to the area of concern which has been identified. The standards of care which Jai Medical Systems has used to develop certain treatment protocols are examples of typical standards of care which will be used for comparison purposes. These sources include the American Academy of Pediatrics and the American College of Obstetricians and Gynecologists.

Please see Section 3 for separate QOC studies which are based on current demographics, as well as areas of interest as dictated by our Quality Assurance Committee and executive management.

K. CORRECTIVE ACTION PROCESS

Based on the results of the Quality Assurance Committee's analysis regarding the QOC study, the Committee will formulate methods for Jai Medical Systems to improve its care delivery when necessary. The methods for improvement specified by the Quality Assurance Committee will include a clear identification of the types of problems requiring corrective action and full description of the corrective action plan including its implementation schedule. The Quality Assurance Committee will formally present its recommendations to the Board of Directors for review at their next meeting.

All corrective actions that have been recommended by the Quality Assurance Committee and approved by the Board of Directors are implemented as applicable throughout the Jai Medical Systems organization. Once implemented, corrective actions are monitored, evaluated, and adapted as necessary by Jai Medical Systems' Quality Assurance Committee to assure that the changes are effective.

L. PROVIDER PARTICIPATION IN THE QUALITY ASSURANCE PLAN

Participating physicians and other providers in the Jai Medical Systems' provider network are kept informed of the written Quality Assurance Plan. Quarterly reports from the Quality Assurance Committee are available to providers. Jai Medical Systems includes in all of its provider contracts and employment agreements, for both physician and non-physician providers, a requirement securing cooperation with the Quality Assurance Plan.

Contracts with hospitals and other contractors specify that Jai Medical Systems will be allowed access to the medical records of its members.

M. ACCOUNTABILITY TO THE GOVERNING BODY

Jai Medical Systems' Quality Assurance Committee shall be accountable to Jai Medical Systems' Board of Directors. The Board of Directors shall be responsible to the Quality Assurance Committee for monitoring, evaluating, and making improvements to the care delivered. These functions shall include:

1. Oversight of the Quality Assurance Plan — The Board of Directors will annually review the Quality Assurance Plan and indicate their acceptance of the Plan by the Medical Director's signature at the end of the document, as well as on each separate policy pertaining to Quality Assurance.
2. Oversight Entity — The Board of Directors has ultimate oversight of the Quality Assurance Program.
3. Quality Assurance Progress Reports — The Quality Assurance Program shall provide a Quality Assurance Report each quarter to the Board of Directors, which shall contain a description of the actions the Committee members have taken, progress towards Quality Assurance objectives, and any improvements made.

4. Annual Quality Assurance Program Review — The Board of Directors shall formally review an annual written report on the Quality Assurance Program which shall include: studies undertaken, results, subsequent actions, and aggregate data on utilization and quality of services rendered, to assess the Quality Assurance's continuity, effectiveness, and current acceptability.
5. Program Modification — The Board of Directors shall take action, when appropriate, upon receipt of regular written reports from the Quality Assurance Committee delineating actions taken and improvements made, and direct that the operational Quality Assurance Plan be modified on an ongoing basis to accommodate review findings and issues of concern within the Managed Care Organization. This activity with the Board of Directors will be documented in the minutes in sufficient detail to demonstrate that it has directed and followed up on necessary actions pertaining to Quality Assurance.

It should be noted that Jai Medical Systems infrastructure allows all Board of Directors members to sit on the Quality Assurance Committee as well. Reports are distributed to all QAC members on a quarterly basis, including the Board of Directors. The Board of Directors has an opportunity to discuss QA activities in a confidential manner through regular meetings.

N. ADEQUATE RESOURCES

Jai Medical Systems' Quality Assurance Program has extensive material resources and staff with the necessary education, experience, and training to carry out its specified activities.

Material Resources

The standards to which the Jai Medical Systems Quality Assurance Program (QAP) adheres are based on the official, published practice parameters endorsed by professional organizations such as:

- The American Academy of Pediatrics (AAP)
- The U.S. Department of Health and Human Services' Public Health Service (PHS)
- The American College of Obstetricians and Gynecologists (ACOG)
- The National Committee on Quality Assurance (NCQA)

As these practice parameters are constantly being updated, new information must be obtained periodically, at least annually. The changes that these revisions entail will be incorporated, as they occur, into the Program by the Quality Assurance Committee and the Physician Advisory Subcommittee.

Jai Medical Systems will also provide adequate data and information management systems in order to ensure that the Quality Assurance Program committees function properly and have access to any needed data, as well as the ability to manipulate the information that they compile from record reviews.

Staffing Resources

Jai Medical Systems' Quality Assurance Program will be set into action by staff with the education, experience, and training necessary to accomplish the task to which they are appointed. Should a new appointee, to any facet of the Quality Assurance Program, be lacking in some aspect according to the above statement, such a deficit will be ameliorated in a timely fashion by reasonable means. For detailed information on staffing resources, please see staffing comparison document (Attachment 1).

O. CREDENTIALING AND RECREDENTIALING

(Please see Credentialing and Recredentialing binder.)

P. MEMBER RIGHTS AND RESPONSIBILITIES

(Please see Enrollee Rights binder).

Q. NON-DISCRIMINATION

(Please see 19.18 Non-Discrimination Policy)

R. STANDARDS FOR AVAILABILITY AND ACCESS

(Please see Access and Availability binder).

S. MEDICAL RECORDS STANDARDS

(Please see Jai Medical Systems' Medical Records Standards Policies and Procedures).

T. UTILIZATION MANAGEMENT PROGRAM

(Please see Utilization Review binder).

U. CONTINUITY OF CARE SYSTEM

(Please see Continuity of Care binder).

V. QUALITY ASSURANCE PLAN DOCUMENTATION

Scope

Jai Medical Systems monitors the quality of care across all services and all treatment modalities according to its Quality Assurance Plan. The review of the entire range of care is continuous and ongoing. Review and evaluation reports are provided on a quarterly basis.

Maintenance and Availability of Documentation

As indicated in its Quality Assurance Plan, Jai Medical Systems will maintain and have available to the Maryland Department of Health, reports, protocols, standards, worksheets, minutes, and other documentation as appropriate, concerning its Quality Assurance activities and corrective actions. Reports will be provided monthly, quarterly, or as often as necessary.

W. COORDINATION OF QUALITY ASSURANCE ACTIVITY WITH OTHER MANAGEMENT

The findings, conclusions, recommendations, actions taken, and results of the actions taken as a result of the Quality Assurance activity are documented and reported to appropriate individuals within Jai Medical Systems. Quality Assurance information is used for recertification, re-contracting, and/or annual performance evaluations. Quality Assurance activities are coordinated with other performance monitoring activities, including utilization management, risk management, and resolution and monitoring of member complaints and grievances.

Within Jai Medical Systems, there is a linkage between Quality Assurance and the following management functions:

1. Provider Relations
 - a. Practice feedback to providers
 - b. Provider satisfaction survey
 - c. Provider complaint resolution process
 - d. Credentialing and recertification
 - e. Access/availability
 - f. Subcontractor and vendor compliance
2. Customer Services
 - a. Member education
 - b. Member complaint resolution process
 - c. Member satisfaction survey
 - d. Benefits design and redesign
 - e. Member rights and responsibilities
3. Systems Management
 - a. Enrollment/membership data
 - b. Claims/encounter data
4. Utilization Management
 - a. Medical management
 - b. Pre-certification
 - c. Continuity of care

The quality assurance functions for Jai Medical Systems are executed through the Quality Assurance Committee with input from the Consumer Advisory Board.

X. WRITTEN PROCEDURES OR GUIDELINES

Jai Medical Systems has developed guidelines for treating the diagnoses most frequently encountered in the populations served by the Jai Medical Systems' medical centers, as well as treatment and referral guidelines for some special populations. These guidelines were developed by Jai Medical Systems' Medical Director, members of the Special Populations Management Team, and the PASC to care for the Jai Medical Systems' members more effectively and consistently.

The aforementioned guidelines are reviewed and/or updated annually by the Physician Advisory SubCommittee. The standard of care outlined in these guidelines is the expected, prescribed standard of care given to Jai Medical Systems' members by the primary care providers - any less is considered unacceptable and will subject the provider to disciplinary actions upon routine Quality Assurance Reviews, focused Care Studies, and Peer Reviews. The primary care providers must, in the course of treating any member, document all actions, as well as reasons behind decisions. Deviation from the prescribed standard of care is acceptable only in cases when there is adequate documentation with research-based reasoning. Care delivered that exceeds the standards set forth is acceptable, but should also be documented.

All Jai Medical Systems staff members shall always conduct themselves in a respectful, professional manner towards members, other staff members, and any other person in contact with these offices. The staff shall act promptly on requests from members and aim to deliver quality service consistently — whatever their role in the running of the office, they must always function as a team.

Y. GRIEVANCE COMMITTEE STRUCTURE & PROCESS

(Please see Enrollee Rights binder).

Z. CASE MANAGEMENT PLAN

The Utilization Management and Case Management Departments at Jai Medical Systems Managed Care Organization, Inc. are committed to ensuring high quality care to our members. Case Management is a patient-centered process designed to promote quality cost-effective care. Case Management addresses a broad spectrum of individual needs across a continuum – rather than a single episode – of care and can involve various levels of care. The purpose of the Case Management Plan for JMSMCO is to have a comprehensive, systematic plan for assessing, planning, coordinating, monitoring, and arranging the delivery of medically necessary and appropriate health related support services to members in a cost effective manner. The goals of the Case Management Plan for JMSMCO are as follows:

1. To increase coordination of services provided.
2. To improve the cost-effectiveness of health care for members.
3. To decrease hospital utilization.
4. To increase member and provider satisfaction.
5. To improve member adherence to professional recommendations.
6. To enhance member functional abilities.

7. To improve member health status.
8. To ensure patient safety.
9. To maximize the utilization of preventive health services.

The case management process includes assessment, planning, implementation, coordination, monitoring, and evaluation. Assessment is the process of collecting in-depth information about a person's situation and functional status to identify individual needs in order to develop a comprehensive case management plan that will address those needs. Planning is the process of determining specific objectives, goals, and actions designed to meet the client's needs as identified through the assessment process. Implementation is the process of executing specific case management activities and/or interventions that will lead to accomplishing the goals set forth in the case management plan. Coordination is the process of organizing, securing, integrating, and modifying the resources necessary to accomplish the goals set forth in the case management plan. Monitoring is the ongoing process of gathering sufficient information from all relevant sources about the case management plan and its activities to enable the case manager to determine the plan's effectiveness. Evaluation is the process, repeated at appropriate intervals, of determining the case management plan's effectiveness in achieving the desired outcomes and goals. These components are applied across the continuum of care to address the needs of the member. Case Management involves interaction and collaboration with all relevant parties including family members, physicians, hospitals, and ancillary care vendors and facilities.

The philosophy of Case Management is that all individuals, particularly those suffering from catastrophic and/or high risk or costly injuries or illnesses, should be afforded the services of a Case Manager regardless of the member's ability to pay. The provision of case management in these most difficult healthcare situations will serve to identify care options which are acceptable to the client and family, thus increasing compliance with the treatment plan and successful outcomes. Case management in these instances will also reduce the fragmentation of care, which is often experienced by clients who obtain healthcare services from multiple providers. Taken collectively, the services offered by a professional Case Manager will enhance quality of life while reducing the total healthcare costs. Thus, effective case management will directly and positively affect the social, ethical and financial health of the country and its population.

(Please see Continuity of Care binder)

1. **POPULATION HEALTH MANAGEMENT (PHM)**

In 2019, JMSMCO began to focus on a PHM strategy that follows NCQA's guidelines. Through our PHM strategy, targeted populations are identified through routine review of membership, health outcomes, population assessment, and member risk stratification. (Please see Population Health Strategy)

2. **DIABETES PREVENTION PROGRAM**

Beginning September 1, 2019, Jai Medical Systems is now offering the Diabetes Prevention Program at no cost for eligible members who qualify to participate in the program.

AA. SUBCONTRACTOR QUALITY ASSURANCE MECHANISMS

Jai Medical Systems will monitor, evaluate, and take action to address any needed improvements in the quality of health care delivered by Jai Medical Systems' providers. This includes assessing the quality of care provided by all of Jai Medical Systems' subcontracted providers, whether preventive, primary, specialty, emergency or ancillary services delivered in inpatient, ambulatory, or home settings. In order to ensure subcontractor compliance with Jai Medical Systems' Quality Assurance Program, Jai Medical Systems includes, in all its provider contracts and employment agreements, a provision securing the provider's cooperation with Jai Medical Systems' Quality Assurance Program. In addition, all of Jai Medical Systems' contracts with hospitals and other providers specify that Jai Medical Systems be given access to the medical records of members.

To ensure provider performance, including all subcontractors, Jai Medical Systems provides to all practitioners a provider manual which includes information and guidelines regarding medical records management, case management, and utilization review. Jai Medical Systems' provider relations department serves as a second source, in addition to the provider manual, for provider education.

Jai Medical Systems' most pro-active mechanism for ensuring the quality of services delivered by its subcontractors is claims management. Jai Medical Systems' claims management process includes utilization management and fraud prevention and detection. Jai Medical Systems' utilization management process is designed to establish criteria for the appropriateness of given medical services, to evaluate the necessity of such given medical services, particularly those with a high cost, against the established criteria, and to ensure that the usage criteria is applied consistently across providers and members. Utilization management is applied both prospectively and retrospectively. Examples of situations in which Jai Medical Systems applies prospective utilization management are outpatient service pre-authorizations and inpatient pre-admission certifications. An example of retrospective utilization management is the review of medical records or encounters to evaluate the appropriateness of where a service was rendered or the level of service provided. Jai Medical Systems' fraud prevention and detection process is applied to every claim. The process includes the evaluation of member eligibility, place of service vs. procedure, provider type vs. procedure, procedure vs. diagnosis, appropriateness of code, and any other verifications.

Jai Medical Systems also conducts contract monitoring of all subcontractors. This monitoring includes a review of each provider's contract and an evaluation based on each subcontractor's compliance with contract terms. Contract monitoring is conducted by Jai Medical Systems' administrative staff either on site or off site and is performed thirty days following the initiation of all contracts and at least annually there-after.

BB. MEDICAL RECORD MAINTENANCE SYSTEM

(Please refer to Jai Medical Systems' Medical Records Standards Policies and Procedures)

CC. PROVIDER APPRAISAL OF OFFICE PROCEDURES

Jai Medical Systems providers are informed in writing regarding all provider performance requirements including, but not limited to, medical records maintenance, utilization review, and

case management. Practice performance requirements and guidelines are covered in the Provider Manual which is given to every Jai Medical Systems provider. *(Please see separate bound copy of the Provider Manual)* Jai Medical Systems' Provider Relations Department will supply additional information or educate providers as necessary or when the need arises. Further, all of Jai Medical Systems' providers are contractually obligated to adhere to provider performance requirements.

DD. INCLUSION OF REFERRAL REPORTS IN MEDICAL RECORD

All Jai Medical Systems providers are required by Jai Medical Systems' medical records maintenance guidelines to incorporate all medical reports from referral resources in the member's chart. Prior to being filed the report must be signed and dated by the member's primary care provider. All referral resources are required to send a report back to the member's primary care provider following treatment. To ensure compliance, periodic audits of member records are conducted which include a thorough review of the member's referral history. In the event that a referral resource has been reimbursed for services for which they should have sent a report to the member's primary care provider but did not, the paid claim may be subject to review. Further, Jai Medical Systems' Provider Relations Department may be called upon to provide instructions to the referral resource regarding proper referral reporting procedures.

EE. PROVIDER COMPLAINT PROCESS

(Please see Credentialing/Recredentialing binder)

FF. MEDICAL RECORD RETENTION & RETRIEVAL SYSTEM

(Please refer to Jai Medical Systems' Medical Records Standards Policies and Procedures)

GG. RELATIONSHIP WITH SCHOOL-BASED CLINICS

Overview

Jai Medical Systems is committed to continuity of care for the school-aged population at the elementary, middle, and high school levels. Positive relationships will be established with school-based health centers to develop effective communication and a collegial spirit with the health center staff. The goal of the communication between the primary care provider and the school-based health center is that the primary care provider shall be in possession, as quickly as possible, of the complete medical record of the member. The primary care provider should function as the clearing-house of information for each member under his/her care.

Process

To facilitate this relationship, Jai Medical Systems pediatricians shall obtain the current school information on each of its school-aged members, i.e., name of school, location, phone number, and note such information in the child's medical record. If the child's school is one with a

school-based health center, the appropriate contact person at the health center will be sent an introductory letter from the member's primary care provider with signed copies of the School-Based Health Center Record Request Form. This practice shall facilitate the process of medical records communication between the school-based health center providers and the primary care provider. Parents of school-aged members will also be informed about the regulations regarding services that school-based health centers may provide and their purpose in the overall health care plan of the member.

By regulation, school-based health centers are required to:

- A. Refer the student back to the student's primary care provider for any additional, indicated follow-up services after providing acute or urgent follow-up care for somatic illness;
- B. Refer the student to the student's primary care provider whenever the student needs to have a treatment plan developed, or when any change in the student's treatment plan is needed; and
- C. Transmit to the student's Managed Care Organization, within 2 business days, reports regarding self-referred services provided, for inclusion in the student's medical record, but, if the student needs follow-up care by the primary care provider within 1 week, the school-based health center shall telephone or fax the information to the student's primary care provider.

Whenever a school-based health center accepts assignment of a Jai Medical Systems member for services the health center is eligible to provide, payment for such services is contingent upon the acceptance by that health center of the conditions of any subcontractor participating with Jai Medical Systems.

Services Eligible and Ineligible for Reimbursement

Eligible Services

Jai Medical Systems shall promptly reimburse undisputed claims, for which a report and appropriate billing data in 1500 form format are in receipt, for such services specified in COMAR 10.09.68.03 §A. These are:

- A. Diagnosis, treatment, and uncomplicated follow-up (limited to one follow-up visit at the school-based health center) of acute or urgent somatic illness and related prescribing of medications; and
- B. Family planning services specified in COMAR 10.09.65.20 §A (2), (6), (7).

Ineligible Services

Jai Medical Systems shall not reimburse claims for the following services, specified in COMAR 10.09.68.03 §B. These are:

- A. Basic school health services as defined in COMAR 13A.05.05.05 thru .15; and
- B. Follow-up treatment for acute or urgent somatic illness that exceeds one visit.

Contingency for Payment of Pharmacy & Laboratory Services

Jai Medical Systems shall require, pursuant to COMAR 10.09.65.20, members to utilize in-plan providers for pharmacy and laboratory services ordered by any school-based health center that is not within the Jai Medical Systems provider network, except when the pharmacy or laboratory service is provided in connection with the abovementioned authorized school-based health center services and the pharmacy or laboratory service is to be delivered on-site by the out-of-plan provider at the same location as the above-referenced care.

HH. PROVIDER PRACTICE GUIDELINES

Purpose

The purpose of the Provider Practice Guidelines is to assist practitioners in approaching the health care they deliver in a systematic, appropriate manner.

Definition of Primary Care

Primary Care is defined as provision of health care in a fashion that is focused on wellness, education, member involvement, and preventative medicine for the whole spectrum of ages. It is holistic in approach and broad in scope.

Definition of Specialty Care

Specialty Care is defined as the provision of health care in a fashion that is concerned with complex, extreme, or otherwise unusual disease processes and such diseases that may be limited to specific age ranges. It is problem-oriented and limited in scope.

Goals for Guidelines

The goals of the Provider Practice Guidelines are as follows:

- To ease the assimilation of new providers into the Jai Medical Systems network;
- To serve as a reference for all providers as to the proper policies and procedures of the Jai Medical Systems network;
- To provide fair knowledge of such policies and procedures to providers in order to stave off member grievances;
- To enhance the providers' understanding of the resources available to him/her within the Jai Medical Systems network;
- To increase the uniformity among Jai Medical Systems providers' practice styles, thereby easing transfer of records and other member information among providers within the network.

Goals for Primary Care Providers

The goals for Primary Care Providers are as follows:

- A. To keep knowledge of practice standards within personal field of practice up-to-date to the end of administering quality health care;
- B. To practice in a collaborative way with other Jai Medical Systems providers and staff;
- C. To screen for likely potential disease processes, based on member's health history, lifestyle, and family history;
- D. To educate members regarding ways to prevent disease processes they are at risk for, based on the above reasons;
- E. To educate members regarding their current disease processes;
- F. To develop treatment strategies for prevention of current disease sequelae;
- G. To encourage members to develop healthy lifestyle habits;
- H. To facilitate the coordination of any necessary specialty care;
- I. To function as a case manager for those members with multiple needs;
- J. To monitor personal delivery of health care for cost-effectiveness.

Goals for Specialty Care Providers

The goals for Specialty Care Providers are as follows:

- A. To keep knowledge of practice standards within personal field of practice up to date to the end of administering quality health care;
- B. To practice in a collaborative way with other Jai Medical Systems providers and staff;
- C. To monitor personal delivery of health care for cost-effectiveness;
- D. To augment the primary care providers by providing advanced knowledge about disease processes;
- E. To serve as a resource in the ongoing care of members with complex or unusual diseases;
- F. To aid in the development of treatment and referral protocols for members with complex and/or unusual diseases.

1. General Rights & Responsibilities of Providers:

Up-To-Date Clinical Knowledge

It is expected that the primary care provider will practice according to the most up-to-date practice standards available. This is a serious responsibility. The members found within Jai Medical Systems' member population are often quite sick and often suffer from multiple disease processes. It is vital to their care that the primary care provider understand the implications that these disease processes have on each other and on the member's health.

Each medical center offers a resource library containing up-to-date manuals on family and internal medicine, as well as current copies of such reference manuals as the PDR. Current copies of various clinical journals are also available in each library. The primary care provider is encouraged to utilize the library and update his/her general knowledge base or hone particular skills pertinent to the problems presented by specific members.

Collegial Attitude Towards Other Staff

Jai Medical Systems' network of health care delivery facilities are each organized similar to a group practice. Each primary care provider is expected to function as part of a team and to provide professional support to the other primary care providers.

This collegial attitude translates into recognizing the strengths of the other providers within the practice setting and offering one's strengths to them in return. It is also expected that each provider will be respectful of the other providers in such ways as not 'taking over' another's members unless the member has specifically requested a change of PCP. However, if the member's customary provider should be absent or unable to attend the member for any reason, the member might benefit from the experience of a different provider's particular strengths.

Expected Conduct Toward Members

- A. Consistently treat members with respect and dignity;
- B. Deliver quality health care regardless of age, race, nationality, gender, religion, physical or mental disability, or type of illness or condition;
- C. Respect the confidentiality of all medical records;
- D. Administer care in an efficient, courteous, and timely manner;
- E. Administer appropriate medical interventions for the diagnosed disease process;
- F. Explain to the member what their illness is and why it is treated in the manner in which you have chosen, as well as the consequences if the member chooses not to cooperate with the chosen plan of action;
- G. Document thoroughly all subjective information provided by member, all exam findings, and all care provided;
- H. Teach members about the products and services they utilize;
- I. Provide enough information that the member is able to make an informed decision regarding their health care prior to any procedure or medication regimen.

Expected Conduct from Members

- A. Consideration and respect for the treatment staff;
- B. Appropriate and timely returns when PCP requests such;
- C. Patience with staff in times of unforeseen delays in the running of the office;
- D. Provision, whenever possible, of all appropriate accurate medical information needed by provider;
- E. Expression of opinions, concerns, or complaints regarding health care in a manner prescribed by Jai Medical Systems' policies;
- F. Involvement in their care and interest in their own health management;
- G. Provision of true and up-to-date information on changes in family status and address;
- H. Cooperation with the designated care plan or discussion if the member does not agree to this plan;
- I. Not demand treatments that have been determined to be contrary to acceptable medical practices and/or Jai Medical Systems' Treatment Protocols;
- J. Compliance with prescribed treatment regimen;

- K. Not engage in illegal acts, such as forging or falsifying a provider's name on documents requiring such signatures or stealing all or part of a medical record, which is deemed to be the property of Jai Medical Systems.

2. Primary Care Procedures:

Front Desk Flow

At the initial visit, the MA recipient presents their card identifying them as a Jai Medical Systems member. A Certified Medical Assistant (CMA) then obtains their identifying information, such as name, date of birth, address, telephone number, Social Security number, and an alternate phone number (e.g.; a friend or relative's phone number). All identifying information is entered into the database of our Management Information System (MIS).

When it is the new member's turn to see his/her primary care provider, a different Certified Medical Assistant queries the member regarding his or her medical history, current health, and the problem that caused the visit. This information is recorded on a customized encounter form which is used to prepare the member's chart. The information on the encounter form will also be entered into the computer database for tracking and reporting purposes. The CMA also takes the member's vital signs and directs him or her to the desired member of the primary care team.

Primary Care Visit

The primary care provider establishes the member's chief complaint, or reason for coming in to see his/her primary care provider. Next, he or she conducts an interview which includes: a review of systems, past medical history, family medical history, and immunization record. The provider assesses the member for risk factors for cancer, heart disease, diabetes, substance abuse, and sexually transmitted diseases, including HIV. The primary care provider then performs a comprehensive physical examination, makes appropriate diagnoses, and formulates a treatment plan that includes education plans, follow-up times, medication, and plans for future visits. The primary care provider also orders essential tests to confirm the diagnoses and, if indicated, refers the member to other treatment services. The provider also disseminates any educational information which is relevant to the member's particular health care needs. A return appointment is made for the member for his/her next follow-up visit.

All member encounters are documented legibly using the customized History and Physical encounter form and the Intake sheet which have been designed specifically for Jai Medical Systems' needs. The History and Physical form document the findings from the initial complete physical, as well as the basic medical history of the member. The Intake Sheet functions as a long-term tracking device for each member, recording each time that a test is performed, lab work drawn, or counseling performed. It also records a list of the member's chronic conditions and on-going medications. This form was designed to be a quick summary of the events of the member's medical history.

Once a member has been seen for his/her initial visit with his/her primary care provider, the process of building a relationship can begin and the member can begin on a process of improving his/her health through education and healthy living. The primary care provider will implement

short and long term goals at each visit based on the initial treatment plan and will modify the treatment plan as changes in the member's health and life occur.

All diagnoses tracking and billing is accomplished through the use of a computerized system in place at each of the four core Jai Medical Systems health care delivery centers. All network providers will have the option of sending claims via a modem connection or submitting a paper claim on a CMS 1500 form. Each of these centers has a Local Access Network (LAN) in place within the building. The system in place at the four core Jai Medical Systems facilities allows for providers to log into any of the four networks via the Internet from remote locations, twenty-four hours a day.

In order to streamline the delivery of health care to the members of Jai Medical Systems, there are established member treatment protocols for problems seen often in the members enrolled with Jai Medical Systems. These include: Hypertension, Low Back Pain, Depression, High Risk for HIV Infection, Preventative Women's Health, Children with Special Health Care Needs, Individuals with a Physical Disability, Individuals with a Developmental Disability, Pregnancy & Postpartum, Homelessness, Treatment of HIV/AIDS, Immunizations, Pediatric Asthma, Lyme Disease, Diabetes, Lead Screening, and Biological Agents.

Routine Follow-up

Members are assigned a return date based on the exam findings or procedures. Primary care providers (PCPs) are expected to give fair return dates, neither over nor under a reasonable time frame given the member's condition. Emphasis should be placed on educating the member to encourage self-care and familiarity with the potential complications associated with his/her particular disease process(es). Once a member is stabilized into a medication routine and diet/exercise regimen, the frequency of visits should decrease, other than for miscellaneous acute illness or injuries, and the time between visits should increase. The goal is not to limit the member's access to health care when it is needed, but to avoid overuse by a few members so as to maximize the overall member load volume. Any member with a health concern will be seen when the member requests care.

Referral Process

The primary care provider is responsible for facilitating referrals of members for specialized care. Referral is initiated by the primary care provider's completion of the Jai Medical Systems Referral Form. The PCP should receive a response from the office of the specialty care provider the same day as the member is seen by the specialist, according to the instructions on the sheet.

A Certified Medical Assistant (CMA) will assist the member in making the referral appointment during the member's exit procedures. After the appointment has been finalized, the CMA will mail the referral slip to the member with the appointment time and date written on it.

A copy of each referral slip should be stored in the member's chart, thus assuring that the provider has a record of the time and location of the appointment. For members who also have a Case Manager, such information becomes even more important because of the need for coordination with yet another person.

Referral Follow-up

A follow-up appointment should always be made for a time shortly after the referral to the specialist so that the PCP will have feed-back from the member on their visit to the specialist and be able to plan accordingly based on the member's experience.

3. Other Clinical Procedures:

Lab work

The PCP is responsible for determining and ordering all necessary lab work on the members they encounter. A carbonless duplicate form is available from LabCorp, the company with whom Jai Medical Systems currently contracts for laboratory studies. The PCP will check the form prior to use to ensure that it is the appropriate form for the member and the service desired, since there are two types of Universal forms (used for blood and culture purposes) and two Cytology forms (used primarily for Pap smears, but also for other types of gynecological procedures or minor surgeries, such as a mole removal).

Lab work will be returned to the PCP's inbox when the testing requested is completed. The usual turn-around is approximately three days. Some testing will always take longer, such as Pap smears, which usually return around two weeks after they are sent out. Stat testing is available when necessary.

Drug Formulary

This list is updated quarterly, and provider recommendations are encouraged. The manual is revised yearly with a new edition published and distributed.

4. Office Procedures:

Time Expectations

PCPs affiliated with Jai Medical Systems' core medical centers are expected to arrive at their designated facilities on the days they are scheduled to work by 9:00 a.m., Monday thru Sunday. All providers are allowed one hour for lunch; however, the staff will be expected to stagger lunch schedules so that at least one provider is always available to cover the office during lunch hours. Moreover, should the member volume be large on any particular day, providers may be requested to shorten their lunch break to accommodate the extra member load. Similarly, PCPs will be expected to remain until all members have been attended and all work completed regardless of whether this requires remaining after the scheduled closing hour.

If a provider is out sick one day, he/she should call in to the answering service as early as possible in the morning, so that the message will be noted at the beginning of the business day and adjustments can be made, if necessary. Vacation time should be requested at least one week in advance.

Provider Grievances

PCPs will be asked yearly to fill out a Provider Satisfaction Survey. In addition to this yearly review, any provider may submit a complaint or grievance through the means specified in the Provider Grievance Protocol.

Supply Acquisition

Primary care providers at core medical centers will have their rooms stocked by a CMA. Front desk personnel will supply any items missing from the PCP's room.

Special items of medical or clerical equipment may be requisitioned upon verification of necessity and reasonableness as determined by the Administrator or the Medical Director.

PCP's are requested to bring to the attention of the staff member assigned to acquisition any items whose supply appears to be dwindling, particularly items that may not be used often and therefore not noticed as easily.

Forms Available

Many preprinted forms are available to the primary care providers employed at Jai Medical Systems' core medical centers; these are designed to facilitate the organization of member care in such a manner that the details and overall focus of care being provided by any PCP may be readily and quickly assessed by any other PCP. PCP's are expected to be diligent, precise, and legible in completing the necessary forms and to bear in mind that in a community of providers such as Jai Medical Systems, everyone's work must be decipherable.

Below is a table that lists the forms in use in member charts and their purposes.

1. Member Intake Form	<ul style="list-style-type: none"> — should be started at the member's first visit — should reflect the highlights of service over the member's time as a Jai Medical Systems member — should be updated when demographic information changes
2. HIV Assessment Form	<ul style="list-style-type: none"> — should be utilized diligently to assure quality of care of the HIV+ member — includes Flashpoint Reminders to guide the care of members with CD4s of 200
3. Lab Forms	<ul style="list-style-type: none"> — should always be signed by primary care provider — should have identifying information filled out about the member at the top of the form — PCPs should use the correct form for the task at hand (Universal for blood and cultures and Cytology for Paps and minor surgeries)
4. MCO Referral Form	<ul style="list-style-type: none"> — should be completed properly and legibly by PCP — should accompany every referral made for a MCO member — should be returned by the specialty provider (by fax) on the day of service in his/her office
5. Nursing Home	<ul style="list-style-type: none"> — should be used only after all options for in-home care have been

Admissions Form	<p>exhausted (refer to Treatment Protocol of Physically Disabled Members) — should be filled out in collaboration with the Medical Director</p>
6. Substance Abuse Form	<p>— should be filled out whenever:</p> <ol style="list-style-type: none"> 1. the member reports a history of or a current substance abuse problem 2. there is reason to believe that the member does have a substance abuse problem (breath smells of alcohol, pupils pinpoint or unusually dilated, etc.) 3. The member fits the DSM-IV criteria for substance abuse <p>— should remain in the member’s chart</p>
7. Prenatal Risk Assessment Form	<p>— should be filled out when a woman is diagnosed with pregnancy — copies should be sent to the Baltimore City Healthy Start Program as directed on the Form — copy should be sent to the Obstetrician’s office who will be caring for the woman during her pregnancy</p>
8. School-Based Health Center Record Request Form	<p>— should be utilized when encountering a member who attends school in which there is a school-based health center, so as to maintain a complete medical record at the primary care provider’s office</p>
9. Introductory letter to provider at School-Based Health Center	<p>— provides introduction to the member’s primary care provider</p>

Other Staff Responsibilities

Jai Medical Systems’ core medical centers have many other staff members who function in different capacities to aid in the comprehensive delivery of health care to the thousands of members who are seen every year by the PCPs at the three facilities. What follows is a description of their roles in this big picture.

1. Certified Medical Assistants	<p>— responsible for running the front desk of each of the medical centers, including:</p> <ol style="list-style-type: none"> 1. Answering the phone 2. Creating superbills for each member visit 3. Registering new members 4. Maintenance and Retrieval of medical records 5. Restocking and organizing the supplies for the PCPs rooms 6. Obtaining appointments at the offices of referral providers 7. Copying and sending out medical records in response to requests 8. Managing and monitoring the money patients pay as co-pays or in the event of a self-pay 9. Making appointments for members who request transportation services 10. Filing reports from referral providers’ offices after the PCP has reviewed the information, including lab work 11. Helping members fill out the identifying information on
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	<p>any social service forms they bring in</p> <p>12. Perform and record members' vital signs.</p>
2. Phlebotomist	<ul style="list-style-type: none"> — draw blood on members whose PCP has requested this service — provide urine cups, etc., when needed for specific tests — maintain a one-month back-up paper copy of all the lab work that is processed — put the PCP copy of the lab report in the appropriate provider's box when such report returns
3. Accounts Department	<ul style="list-style-type: none"> — reconciliation and cost reimbursement — manage all billing and claims for all members of Jai Medical Systems — troubleshoot insurance problems
4. Administration	<ul style="list-style-type: none"> — plan future development of Jai Medical Systems — govern existing organizational systems — authorize changes in existing organizational systems — have authority to hire/fire employees — serve as final authority in grievance cases
5. Secretarial support	<ul style="list-style-type: none"> — provide assistance in the copying of documents — type any necessary correspondence for PCPs and for the administration — maintain correspondence files
6. In-house Gynecology	<ul style="list-style-type: none"> — provide in-house expertise in the field of gynecology, both for member care and for consultation by PCPs
7. In-house Mental Health	<ul style="list-style-type: none"> — provide in-house expertise in the field of mental health, both for member care and for consultation by PCPs
8. In-house Podiatry	<ul style="list-style-type: none"> — provide in-house expertise in the field of podiatry, both for member care and for consultation by PCPs
9. Radiology	<ul style="list-style-type: none"> — provide in-house diagnostic radiological services — reports are generated from the Radiologist's office off the premises, films are taken by a Radiology Technician with many years of experience — films may be viewed by PCPs immediately following their development in-house if necessary for diagnostic purposes

II. HEALTH EDUCATION PLAN

(Please see Health Education binder)

JJ. COMPLAINT RESOLUTION PROTOCOL

(Please see Enrollee Rights binder)

KK. PROVIDER EDUCATION PLAN

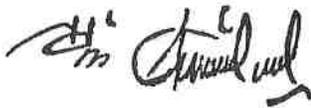
(Please see Health Education binder)

LL. APPROVAL OF ANNUAL REPORT AND QUALITY ASSURANCE PLAN

Jai Medical Systems evaluates the continuity and effectiveness of its Quality Assurance Program by developing a written Quality Assurance and Utilization Management Annual Report. The Annual Report is reviewed, evaluated, and approved annually by the Director of Quality Assurance, the Quality Assurance Committee, and the Board of Directors. Approval of the Annual Report by these entities is represented by the signature of the Executive Medical Director. In order to develop a Work Plan for the following year, the evaluation addresses, at a minimum, Jai Medical Systems’:

- Impact on preventive care and health maintenance, clinical care and services delivered and the achievement of stated goals and objectives;
- Demonstrated improvements in quality;
- Areas of deficiency and recommendations for corrective action;
- Quality assurance studies and other activities completed;
- Analysis of clinical and service indicators and other performance data; and
- An evaluation of the overall effectiveness of the Quality Assurance Program.

The Quality Assurance Plan, as well as the 2020 Quality Assurance and Utilization Management Annual Report were available to the Quality Assurance Committee and the Board of Directors during the first quarter of 2021. All comments were incorporated into these documents and approved. Approval of the documents is signified by the Executive Medical Director, Hollis Seunarine, M.D. on behalf of the Quality Assurance Committee and the Board of Directors.



Hollis Seunarine, M.D.
Executive Medical Director / President

3/31/2021

Date