

Provider Bulletin 19-15 September 26, 2019



Provider Preventable Medical Conditions

The Centers for Medicare and Medicaid Services (CMS) finalized a rule in 2011 (42 CFR parts 434, 438, 447) prohibiting Medicaid payments for the additional costs of medical services resulting from certain preventable healthcare-acquired events (referred to as Provider preventable conditions [PPCs]). There are two categories of PPCs: Health Care Acquired Conditions (HCACs), which apply to inpatient settings, and Other Provider Preventable Conditions (OPPCs), which may occur in any setting.

When a potential PPC is identified, CBH may withdraw payments made or deny claims that have not already been paid. CBH will ensure that all appropriate steps are taken to report these conditions in accordance with state and federal regulations.

For CBH covered services, most of these events will pertain to Falls and Trauma and Other Injuries. These events include, but are not limited to, the following that take place in an acute inpatient unit:

- Significant physical injury to the member by staff (e.g. fractures)
- Sexual assault of a member by staff
- Medication errors that result in a physical health intervention and/or prolong the member's hospital stay
- Suicide (completed suicide will be considered a PPC in instances where there is deviation from protocols or policies or significant findings around quality of care)

The member's case will be assessed by Quality Management staff in consultation with a Medical Director. Quality Management staff, under the direction of the Medical Director, may request supporting documentation from the Provider—including intake notes or lab results—to assist in the determination of the presence of a PPC. The Medical Director will review the documentation to determine if the event was PPC and what portion of the stay was related to treatment of the PPC.

Providers are responsible for submitting the Other Provider Preventable Conditions (OPPC) Self-Reporting Form to CBH every time a PPC is identified, per state regulations. **You can find the form attached to this Bulletin on the CBH website.** The form should be faxed to the Quality Management Department at 215-413-7132.

Please direct questions regarding this Bulletin to Michele Kane, Director of Quality Management, at <u>Michele.Kane@phila.gov</u>.