

# Data Quality Management Program Policy

| Version | Approval Date | Owner        |
|---------|---------------|--------------|
| 1.4     | 5/1/25        | Bill Marella |

## 1. Purpose

This policy establishes the high-level requirements for HealthShare Exchange's (HSX) Data Quality Management Program (DQMP), which governs data quality performance standards and requirements across both internal and external entities

The DQMP will enhance the value, usability, and interoperability of data received by and shared through HSX. Improving data quality will improve the functionality of many use cases within HSX by making the data better conform to industry-standard coding systems, HSX data feed specifications, and computable processes within HSX and at downstream data receivers. Use cases that will benefit from improved coding and computability include:

- Encounter Notification Service (ENS)
- Health Plan Quality Reporting
- Participant Population Health
- Public Health Authority Population Health
- Clinical Data Repository Access
- Accountable Care Organizations
- Patient-Authorized Research
- Social Determinants of Health
- Consent Waived/Medical Records Research

This process also improves the performance of automated data retrieval through HSX Access APIs (query/retrieve of specific clinical data for specific patients) and data sent to downstream receivers through Real-Time Results (streaming data feeds of HL7 or CCD messages directly to payers in real time).

## 2. Scope

This policy outlines the requirements of the DQMP and supporting practices or activities that may be carried out by staff throughout HSX. While primary ownership of the DQMP will be with the Data Analytics and Quality Team, some aspects of this policy may be implemented by other teams such as the Enterprise Project Office (EPO) or the Engagement and Adoption (E&A) Team. All HSX employees, interns, contractors and third parties are required to comply with this policy.

Data governance is owned by the Data Analytics and Quality Team, advised by the Data Quality Workgroup. Data quality is reviewed collectively with HSX leadership, the Clinical Advisory Committee (CAC), and the Board of Trustees. It is also reviewed individually with specific members at times or milestones prescribed by the DQMP, focused on the characteristics and performance of their data feeds in testing and/or production.

## 3. Policy

Because the data in HSX's custody is used by its members in making decisions about care delivered to patients in our region, its accuracy and reliability make important contributions to the health, well-being, and quality of life of patients HSX members serve.

As the custodian of data submitted by its members, HSX shares responsibility for data integrity and quality with its members by supporting validations and creating a series of support systems to ensure data accuracy, reliability and efficiency. HSX will establish quality standards and processes for monitoring and improving data quality continuously. Both HSX and its members have an affirmative responsibility to proactively assess data quality continuously and to address identified deficiencies. HSX will develop and implement periodic quality reviews of data contributed by the members, which will form the basis for ongoing data quality agendas that will be managed and implemented in concert with the membership.

Responsibility for the DQMP will rest with the VP, Value Based Care and Analytics. This DQMP policy will be posted on the HSX Public Web Site with other policies. The DQMP will be reviewed and updated annually.

The DQMP will encompass the activities necessary to assess, monitor, and improve the quality of data assets over time, guided by the following goals:

- While responsibility for the accuracy of data submitted to HSX resides with the originators of the data, HSX will be responsible for proactively assessing, identifying problems, and working with data sources to gradually perfect the data based on member-approved use cases.

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- Members are obligated to engage with HSX on identified data quality issues and to take reasonable steps to correct identified deficiencies.
- HSX's expectations and members' obligations to improve data quality will be considered in the context of the members' level of IT capabilities, the issue severity, the extent to which issues are in the members' control, the level of effort needed to address each issue, how many data receivers or patients may be affected by each issue, and how the data are used in manual and automated processes and decisions.

The DQMP will address the following:

- Data quality performance standards
- Key performance indicators
- Thresholds and benchmarks
- Data Indicators
- Monitoring protocols
- Data Integrity Assessments
- Qualitative and quantitative data quality assessments

The Data Analytics and Quality Team will ensure that data quality issues—both *ad hoc* and resulting from proactive assessments—are systematically identified and tracked to resolution.

Data quality assessment results and other identified issues affecting data quality will be communicated to HSX members.

This policy recognizes that quality of data obtained through external networks (e.g., P3N, eHealthExchange) from non-HSX member organizations is not under HSX's or its members' control.

## 4. Procedures

The following procedures apply to HSX internal operations only:

- Systematic Data Quality Assessments
- Panel Quality Assurance
- Project Management Templates
- Data Feed Go Live Checklist
- EPO Quality Assurance Checklists

## 5. Enforcement

- The VP, Value Based Care and Analytics, is responsible for enforcing compliance with this policy under the direction of the Executive Director.

## 6. Definitions

For a complete list of definitions, refer to the *Glossary*.

## 7. References

- US Core Data for Interoperability (USCDI) <https://www.healthit.gov/isa/united-states-core-data-interoperability-uscdi>

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|------------------------------|------------------------------------|-------------------------|--------------------------------------|
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| <b>Approved By</b>           | HSX Management Team                | <b>Approval Date</b>    | 7/12/21                              |
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| <b>Related Documents</b>     | Glossary                           |                         |                                      |