	<b>Administrative Policy</b>	<b>No.</b>	<b>1.012</b>	
	<b>REPORTING TO DATA REGISTRIES</b>	<b>Title:</b>	<b>Page:</b>	<b>1 of 2</b>
		<b>Effective Date:</b>		<b>08-01-08</b>
		<b>Retires Policy Dated:</b>		<b>12-21-06</b>
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## **I. SCOPE:**

This policy applies to (1) Tenet Healthcare Corporation and its wholly-owned subsidiaries and affiliates (each, an “Affiliate”); (2) any other entity or organization in which Tenet Healthcare Corporation or an Affiliate owns a direct or indirect equity interest of 50% or more; and (3) any hospital or healthcare facility in which Tenet Healthcare Corporation or an Affiliate either manages or controls the day-to-day operations of the facility (each, a “Tenet Facility”) (collectively “Tenet”).

## **II. PURPOSE:**

To establish a process for reporting to data registries in order that information may be readily available to guide quality decisions by senior leadership and the Quality, Compliance and Ethics Committee, in compliance with the requirements contained within the [Corporate Integrity Agreement](#) (CIA) dated September 27, 2006 between Tenet Healthcare Corporation and the Office of Inspector General (OIG) of the Department of Health and Human Services.

## **III. POLICY:**

Tenet participates in selected national benchmarking projects to meet both regulatory requirements as well as internal quality improvement initiatives. This participation, which is conducted through data abstraction at the hospital-level and data submission at the corporate-level, enables analysis of comparative data and identification of performance improvement opportunities.


## **IV. PROCEDURE:**

### **A. Corporate Implementation**

1. The company will participate in data registries that are mandatory. For external agencies that are voluntary, the Senior Vice President of Clinical Quality in consultation with regional Chief Medical Officers will be responsible for determining the external agencies that will receive the company’s clinical data.

2. The Clinical Analysis Group (CAG) will be responsible for timely submission and accuracy of data reported to the data registries that are required by the Clinical Quality department.

3. The capture rate for data at each individual hospital will be determined by comparing billing data to the data submitted by the facility when the requested data is related to billing data. If issues are identified related to the completeness of the data, the hospital is contacted for resolution. Incomplete data is not transmitted to the data registry.

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4. Test submissions will be performed and all error messages addressed prior to the final submission of the production data.

5. Routine calls are held with the vendors to facilitate effective communication and timely resolution of any identified concerns.

6. Facilities with significant variance from others may receive additional support from the CAG and the Director of Clinical Quality Improvement in the Clinical Quality department to assist with improving performance.

**B. Hospital Implementation**

1. Each hospital that is required to perform data abstraction for a specific data registry will establish processes to ensure competency of the data abstraction staff via Inter-Rater Reliability.

2. Data abstraction will be performed timely as required by the CAG team.

3. The Clinical Quality department's National Directors of Clinical Quality Improvement and Education and Development will be available to act as a resource to the hospital to assist in establishing a process for competency of appropriate staff.

4. Education materials will be made available to the hospitals to assist with implementing an effective competency process.

5. The availability of public reports has a time lag of several months. Hospitals can use their internal concurrent reports to compare their progress and to validate if improvement in performance is occurring.

**VI. REFERENCES:**

- [Corporate Integrity Agreement Between The Office Of Inspector General Of The Department of Health and Human Services And Tenet Healthcare Corporation, signed September 27, 2006](#)