NORTHCARE NETWORK

POLICY TITLE: Data Quality Management	CATEGORY: Information Management	
EFFECTIVE DATE: 3/3/06	BOARD APPROVAL DATE: 6/1/11	
REVIEW DATE: 5/23/25	REVISION(S) TO POLICY STATEMENT: ☐ Yes ☒ No	OTHER REVISION(S): ☒ Yes ☐ No
RESPONSIBLE PARTY: Chief Information Officer	CEO APPROVAL DATE: 7/1/25 Megan Rooney	

APPLIES TO
NorthCare Network Personnel
Network Providers

POLICY
NorthCare Network ensures data quality throughout local and regional data collection, calculation, validation, and reporting processes. NorthCare Network and its Network Providers assure compliance with written reporting guidelines and requirements as published by NorthCare Network, MDHHS (Michigan Department of Health and Human Services) and other parties to which NorthCare Network and its Network Providers are required to report. All regional and State reporting will be generated from NorthCare's electronic medical record (ELMER), Great Plains, and other approved sources. NorthCare Network will monitor compliance with reporting requirements through ongoing reporting and data analytics, documentation reviews, and annual site reviews.

PURPOSE
The purpose of this policy is to establish a validation and management system for data that is entered, collected, and utilized by NorthCare Network and its Network Providers. This ensures compliance with necessary reporting requirements and accuracy and timeliness of data.

DEFINITIONS
1. *Accurate Reporting* refers to the timely submission of complete and validated data as defined by MDHHS requirements.

2. *Data Integrity* (1) overall completeness, accuracy and consistency of data (2) assurance that information can only be accessed or modified by those authorized to do so (3) quality of correctness, completeness, wholeness, soundness and compliance with the intention of the creators of the data. It is achieved by preventing accidental or deliberate but unauthorized insertion, modification or destruction of data in a database.

3. *Network Provider* refers to all providers employed or under contract with NorthCare Network, Member CMHSPs, and SUD Providers.

4. *Validated Data* refers to data has been assessed and confirmed for accuracy, completeness, validity, and authenticity either manually or via automated routines.

REFERENCES
- 42 CFR 438.604,438.606
- MDHHS/PIHP Contract, as amended
  https://www.michigan.gov/mdhhs/doing-business/contractor
- MDHHS Estimated Cost of Services Technical Advisory
- MDHHS Explanation of Benefits Technical Requirement
- PIHP Data Certification – Annual Attestation
- ELMER Clinical Directives
- NorthCare Network Information Management Systems Policy
- NorthCare Network Information Management Plan
- SOP – ELMER Data Integrity Procedure
- SOP – ELMER Merge Duplicate Records Procedure
- SOP – ELMER Pre & Post Data Scrubbing Procedure
- SOP – Encounter & Demographic Data Reporting Procedure

HISTORY
REVISION DATE: 1/23/07, 4/5/11, 9/12/13, 8/27/14, 3/21/16, 1/23/17, 11/20/17, 9/12/18,2/18/21, 12/21/21, 10/19/22, 8/1/23, 7/10/24, 5/23/25
REVIEW DATE: 4/5/11, 3/20/13, 9/12/13, 8/27/14, 5/22/15, 3/21/16, 1/23/17, 11/20/17, 9/12/18, 7/30/19, 4/29/20, 2/18/21, 12/21/21, 10/19/22, 8/1/23, 7/10/24, 5/23/25
CEO APPROVAL DATE: 3/20/13, 9/12/13, 8/27/14, 6/2/15, 4/4/16, 2/7/17, 12/11/17, 10/2/18, 8/6/19, 6/2/20, 3/2/21, 1/4/22, 11/1/22, 8/1/23, 8/6/24, 7/1/25
BOARD APPROVAL DATE: 3/3/06, 6/1/11

PROCEDURES
A. NorthCare Network's electronic medical record (ELMER) is developed by PCE Systems and is the primary data source of consumer, staff, and service provider information that is used for validation and reporting.
   1. PCE Systems runs a complete backup of ELMER tables which is downloaded by NorthCare Network every night via a SQL job. The job is stored on the nc-sql server and the ELMER tables are stored within the DATANCR database on nc-sql.
   2. PCE Systems provides a Data Dictionary within ELMER to identify the table and field names to support reporting and warehouse development.

B. NorthCare Network ensures data integrity prior to integrating data that is used to manage key work processes at various points in its lifecycle.
   1. Many forms and modules within ELMER that are utilized for data collection are validated for the reliability of the data entry. ELMER will prompt the user via a warning prior to saving or will prevent the user from saving prior to correcting invalid entries.
   2. Additional validations occur in various stages such as claims adjudication, performance indicator calculations, encounter and TEDS gathering and submission, etc.

C. After data validation is complete, NorthCare Network shall prepare the data for submission to MDHHS in accordance with the Reporting Requirements section of the MDHHS/PIHP contract. The following processes for required and Ad Hoc reporting provide a consistent approach to ensuring data integrity, completeness and

reliability of the information reported. Each step below identifies the primary lens involved – *Quality, IT, or Both*.

1. Review reporting specifications outlined by MDHHS or other oversight/accrediting entities requiring data measures.
   Lens: *Quality* – Ensures alignment with clinical, regulatory, and performance standards.
2. Establish data collection methods based on statistical principles and techniques as applicable.
   Lens: *Both* – Quality defines the methodology; IT ensures data systems can support the collection process.
3. Ensure sample size is sufficient to draw valid conclusions.
   Lens: *Quality* – Applies statistical objectivity to ensure meaningful analysis.
4. Identify output, format and calculations based on requirements.
   Lens: *Both* – Quality defines what needs to be measured; IT ensures system capabilities align with formatting and calculation needs.
5. Establish baseline where appropriate.
   Lens: *Quality* – Determines historical or industry benchmarks for comparison.
6. Establish benchmarks to compare against organization/department's own performance, customer data, and/or comparative data to set goals and target performance levels.
   Lens: *Quality* – Focuses on performance improvement.
7. Submit report request and work with data team to identify the systems that hold the data elements for calculating the measure.
   Lens: *IT* – Identifies and accesses appropriate data systems; *Quality* – ensures relevance of data elements.
8. Extract and validate the data for integrity. If anomalies are found (i.e., incomplete, inaccurate, invalid), identify root cause and correct.
   Lens: *IT* – Performs steps for data output and system-level validation; *Quality* – Reviews for appropriateness and accuracy.
9. Once reliable output is achieved, calculate measure, finalize output and format for submission.
   Lens: *Both* – IT ensures technical accuracy; Quality ensures interpretability, compliance, and formatting not already completed from the IT process.

D. Network Providers are required to implement data quality review procedures. Users shall use tools like ELMER data quality edits, reports, and analytics to identify and correct data issues, by following established reporting criteria or specific data requests.

E. NorthCare Network monitors data quality and reviews operational processes on an ongoing basis to ensure efficiency, and adherence to contractual standards or other auditing bodies as required.

   1. Data quality measures as established by quality improvement initiatives are compared to selected benchmarks as applicable on an ongoing basis or as needed.