



Liberty Healthcare Corporation (Liberty) Liberty QualityCare® Standard Operating Policies – Performance Improvement Processes

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Author:	Robin Burkert, LSW	Last Review Date:	12/10/2021
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Functional Area:	Liberty QualityCare®		

POLICY

Liberty has developed a robust performance improvement process that are the foundation of organizational performance management. The expected outcome is the delivery of ever-improving value to customers and stakeholders, contributing to Liberty’s sustainability and the improvement of overall performance effectiveness and capabilities. At the most basic level, Liberty tracks and reports on contractual performance standards/service level agreements to demonstrate Liberty’s performance to contract requirements. In addition, under the Liberty QualityCare® umbrella, a set of performance improvement initiatives are implemented for the sole purpose of improving performance and managing risk of Liberty’s business service to our customers and persons served and supported through our programs. Such activities and the documentation related to them may contain confidential and proprietary information, including protected health information.

PROCEDURE

Performance Standards required by Program Contract

Liberty’s contracts with our customers may require the company to report data outcomes on specific performance standards and/or service level agreements that have been agreed upon by Liberty and the specific customer. This data is typically provided through a monthly, quarterly and/or annual reports to the customer. The importance of this quality assurance process is to ensure that the company is meeting performance standards specified in the contracts.

Internal Performance Improvement process

Liberty’s internal performance improvement process requires processes to be designed and improved for consistent delivery of services and care with minimum variation and minimum waste. This includes several integrated processes with the sole purpose of improving Liberty and program performance. These processes must support and encourage Liberty operations to optimize the use of resources and ensure meaningful results for our customers and clients. Ongoing performance improvement is as important as other routine management functions, such as budget development and staffing.

The documentation and activities undertaken by Liberty QualityCare will often involve information that is confidential and proprietary to Liberty and/or its clients including but not limited trade secrets and protected health information. Information may also be subject to privileges such as the attorney-client privilege or physician-patient privilege. Therefore, data and documents pertaining to Liberty’s internal performance improvement program should NOT be shared outside of Liberty.

Any performance activity that meets the above criteria should include the following message usually in the footer of the documentation: The following language should be contained on all documents related to Liberty's internal performance improvement process: "CONFIDENTIAL AND PROTECTED INFORMATION – This document may contain information of a confidential nature, which may be subject to protection under the Health Insurance Portability and Accountability Act (HIPAA) of 1996. In the event you are not the intended recipient or the agent of the intended recipient, or you are unable to deliver this communication to the intended recipient, do not read, copy, or use this information contained within this transmission, or allow it to be read, copied or utilized in any manner, by any other person(s). Should this transmission be received in error or there is a problem with the transmission, please notify the Vice President of Performance and Quality immediately at 610-668-8800 Extension # 121."

Performance improvement is measuring the output of a business or clinical process or procedure, then modifying the process or procedure to increase the output, increase efficiency, or increase the effectiveness of the process or procedure. Liberty has a strong commitment to continuous improvement and involves many components of our Liberty QualityCare® product to achieve operational excellence and sustainable results, especially when we are faced with constant change in our health care environment and workforce. This includes but is not limited to support of ongoing learning of performance methodology, improving the quality of services and care, supporting continuous improvement and increasing our ability to think 'out of the box' for solutions which encourages creativity.

Below are Liberty's key performance drivers, that are utilized to assess our existing issues and diagnose root causes, develop comprehensive solutions for closing performance gaps and sustaining performance results. An overview of the performance program is reviewed monthly by Executive Operations with senior and executive leadership during the Corporate Management meetings.

The following procedure provides guidance on the development and implementation of KPIs at the program level:

1. As part of the New Contract Implementation Checklist protocol for new contract implementations, the Contract Manager and the Program Director collaborate to develop a Key Performance Indicators (KPIs) for the first year of operation. They are documented on the KPI form to track the quality of contract performance and progress against contractual deliverables and quality performance goals in each of the five aspects of performance and care.
 - a. KPIs should be developed based on the program's mission statement, contractual requirements, budget, performance data, or licensure/accreditation requirements.
 - b. KPIs should list program management indicators, potential problem areas that need further review/investigation, potential performance concerns specific to that contract, or value-added deliverables.
 - c. If a monthly result is well below an established benchmark in a month OR below benchmark for one (1) quarter, the results are to be in RED on the KPI and a corrective action plan for these RED results will be succinctly recorded on the bottom of the KPI to include but not limited to dates of action completion.

Sentinel Event:

A **Sentinel Event** is defined by The Joint Commission as "a patient safety event (not primarily related to the natural course of an illness or underlying condition of an individual served) that reaches an individual served." The term "clients" will be used in this policy to apply to any patient, client, consumer, offender or resident of a program in which Liberty provides services.

Any critical event identified in Liberty's Incident Reporting and Investigation Standard Operating Procedure, must be reported to the Vice President, Performance and Quality via a Sentinel Event form. Once this detailed information is documented on this form, a copy is forwarded to the Vice President, Quality and Performance Improvement. The sentinel event is analyzed, summarized, and sent to the Chief Operating Officer, General Counsel, Chief Compliance Officer for review to determine if this event is substantiated as a compliance issue. If

further recommendations or actions are recommended following this review of the summary, the Vice President, Quality and Performance Improvement will document the additional actions/recommendations and notify the respective Contract Manager or Director of Operations (DO) or other Liberty Officers depending on the nature of the event.

Peer Review Process:

Following a critical event involving a client, the Vice President, Performance and Quality in collaboration with the Contract Manager may request an external peer review of this critical event to evaluate the clinical and administrative process which could include recommendations to refresh or improve a process. The Peer review process is also used to review and discuss the key performance indicator results of our programs for the sole purpose of improvement of Liberty and staff performance in providing client service and care.

Liberty QualityCare® Consultations:

Within the first quarter following a new program’s removal from the Start-Up list, the Vice President, Performance and Quality will have a consultation that includes an overview of Liberty’s internal performance program, review of the KPI process, review of root cause analysis processes, sentinel event process, corporate compliance process and a detailed review of HIPAA regulations with practical suggestions for regulation compliance. These Liberty QualityCare® Consultations are conducted with all programs as needed to support performance learning and to collaborate on performance improvement ideas and new data indicators as well as updated news on HIPAA, Corporate Compliance and other significant performance issues.

Joint Commission Health Care Staffing Services (HCSS) Certification:

Monthly the Vice President, Performance and Quality submits data on both the credential/competency evaluation review process and the termination for cause data. In addition, regular retrospective audits are conducted and documented to ensure ongoing compliance to competency standards for all staff. This certification includes an annual teleconference review of submitted data and a biannual on-site review of the Credential/Competency Evaluation review data.

Quarterly Quality Shared Services Workgroup:

This workgroup is made up of both Program and Corporate leadership to evaluate Liberty’s preparedness for the Joint Commission HCSS Certification.

Approved By: _____

Revision History

Version	Date	Author	Summary of Changes
#1	11/07/2019	Judith Ann Shields	Policy created
#2	12/10/2021	Robin Burkert	Annual review, various changes made