



Administrator
National Health
Funding Pool

Data Compliance Policy 2020-21

June 2020

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1. Introduction

Data compliance policy background

This document comprises the Administrator's policy on jurisdictional compliance with data provision as required in the Three Year Data Plan 2020-21 to 2022-23 (Data Plan). The objectives of the Data Compliance Policy 2020-21 are to:

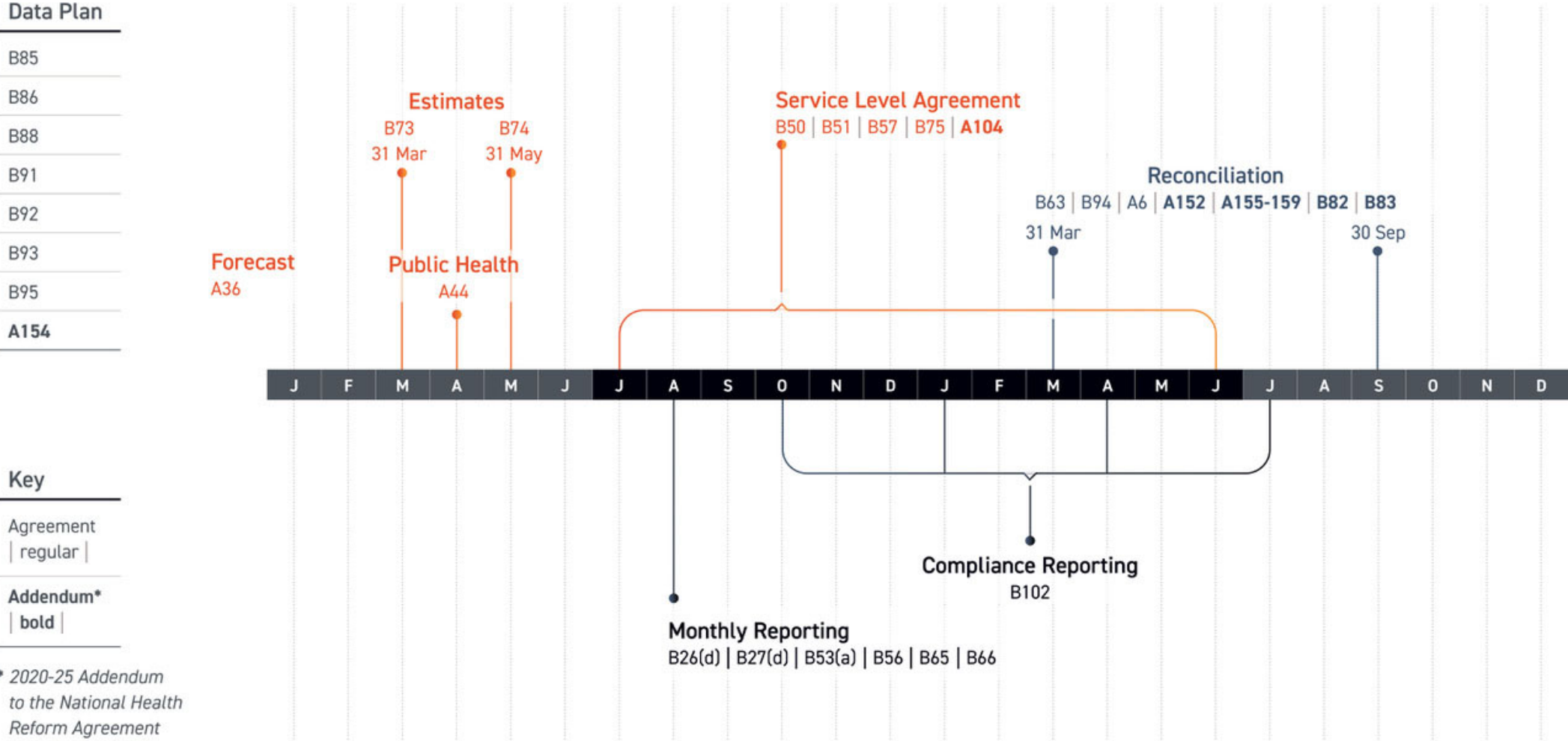
- Support the obligations and responsibilities of the Administrator as per the:
 - *National Health Reform Act 2011* (the Act);
 - *National Health Reform Agreement* (the Agreement); and
 - *2020-25 Addendum to the National Health Reform Agreement* (the Addendum).
- Support the Data Plan by outlining the Administrator's policy on jurisdictional data compliance; and
- Ensure timely and accurate provision of data from the Commonwealth and the States and Territories.

As required under the Agreement, the Administrator revises and resubmits a Data Plan to the Council of Australian Governments (COAG) Health Council each financial year outlining any changes to data requirements. The Data Compliance Policy is then updated as necessary, including any changes to criteria for assessing compliance.

The Data Compliance Policy and associated Data Compliance Report are subject to change and may be updated and reissued by the Administrator at any point. All changes will be communicated with all stakeholders ahead of implementation.

The privacy, confidentiality and security of all data provided by jurisdictions continue to be of particular importance. Systems and processes used for collection, storage and reporting have been designed to ensure security of information. Where data may be considered 'personal information' within the meaning of the *Privacy Act 1988*, additional measures have been adopted to ensure that its collection and use are in accordance with the Australian Privacy Principles in the *Privacy Act 1988* and with the secrecy and patient confidentiality provisions in the Act and other statutory protections.

2. Data cycle



3. Data requirements

The Administrator requires several types of information to perform the functions set out in the Agreement, the Addendum and the Act:

- Service category activity estimates for each State and Territory and Local Hospital Network (LHN) level based on projected signed Service Agreements with LHNs. This is required in order to calculate and provide a formal forecast of the Commonwealth funding contribution to the Commonwealth Treasurer.
- Signed Service Agreements are required to be provided to Administrator via email nhfa.administrator@nhra.gov.au (including virtual notional and contracted services LHNs – see *Section 5 Virtual, Notional and Contracted Services LHNs*). Updated estimate submissions must be accompanied by updated signed Service Agreements for each LHN.
- Disaggregated unit level activity data from States and Territories. This data is required in order to perform six and twelve month reconciliation based on actual levels of activity and must be accompanied by a Statement of Assurance from a senior health department official.
- Commonwealth data relating to Medicare Benefits Schedule (MBS) and Pharmaceutical Benefits Scheme (PBS) services accompanied by a Statement of Assurance from a senior health department official on the completeness and accuracy of the data.
- Funding, payments and service volumes. This data is required in order to enable monthly reporting of relevant National Health Reform (NHR) funding, payments and service volume.

Table 1: Jurisdictional data provision and reporting requirements

Requirement	Clause^	Description
Estimated weighted service volumes by State or Territory and service category	B73	This is required in order to calculate and provide a formal forecast of the Commonwealth funding contribution to the Commonwealth Treasurer and is required by the end of March in the preceding financial year.
Estimated weighted service volumes by LHN and service category	B74	This is required in order to calculate and provide a formal forecast of the Commonwealth funding contribution to the Commonwealth Treasurer and is required by the end of May in the preceding financial year.
Public Health amounts	A44	This is required to maintain the Commonwealth's commitment to public health growing by the former National healthcare Special Purpose Payment (SPP) growth factor.
LHN Service Agreements	B75	Jurisdictions will provide signed Service Agreements for each LHN to the Administrator once agreed and will include at a minimum:
	D8	<ul style="list-style-type: none"> the number of services at the service category level to be provided by the LHN (D8a); the mix of services at the service category level to be provided by the LHN (D8a); the level of funding to be provided to the LHN through ABF, reported on the basis of the national efficient price (D8c); and the level of funding to be provided to the LHN through block funding (D8c). <p>To assist States and Territories in improving their performance in meeting the Service Agreement reporting requirements of the Agreement, a suggested NHR funding table template for inclusion to 2020-21 Service Agreements is provided at Attachment A.</p> <p>To meet the requirements under Clause D8a and D8c for virtual, notional or contracted services LHNs, see <i>Section 5 Virtual, Notional and Contracted Services LHNs</i>.</p>
	B50	States and Territories and LHNs can amend Service Agreements in order to adjust service volumes or pricing.
	B51	States and Territories will notify the Administrator within 28 calendar days of variations to Service Agreements.
	B57	States and Territories can cause Commonwealth payments to be modified by changing relevant Service Agreements and notifying the Administrator in accordance with clause B51 (within 28 days).
Quarterly activity data submission	B71 A72 of the Addendum	Submission of activity data on a quarterly basis is required to assist with streamlining and completing the six-month and annual reconciliations in a timelier manner.
Submission A	B63	Gross volume and patient identified hospital activity data regarding actual services delivered, to be provided within at least 3 months of the end of each reconciliation period.

Table 1: Jurisdictional data provision and reporting requirements (continued)

Requirement	Clause^	Description
Publication of data submission and re-submission dates	A152 of the Addendum	The Administrator is required to provide a data compliance report detailing the dates on which jurisdictions provided data under B63, B73 and B74; dates on which resubmissions were made and dates on which reconciliation was completed.
Statement of Assurance	B82 of the Addendum B83 of the Addendum	States and Territories will provide the IHPA with a Statement of Assurance from a senior health department official on the completeness and accuracy of all approved data submissions and resubmissions. The Commonwealth will provide the Administrator with a Statement of Assurance on the completeness and accuracy of data submissions relevant to the MBS and PBS (A6, A8). A Statement of Assurance is not required for the first quarter and third quarter period submission of activity data.
Submission B	B94	Patient's Medicare number for each service in Submission A (replaced with a Medicare PIN by the Commonwealth Department of Human Services). This submission also includes a state record identifier to enable linking to Submission A.
Sentinel Events	A166 of the Addendum	States and Territories will provide the IHPA with a separate file with the details of any episode that includes a sentinel event. This submission also includes a state record identifier to enable linking to Submission A (B63).
HAC	A167-168 of the Addendum	The Administrator may request additional data (beyond what is required under the Data Plan) be provided by the States and Territories to support the introduction of new policies such as pricing for Safety and Quality.
MBS and PBS data	A6	Patient de-identified data for MBS claims, Pharmaceutical Benefits Scheme (PBS) claims and any other Commonwealth program. This can be linked to hospital activity data provided by States and Territories using the Medicare PIN.

Table 1: Jurisdictional data provision and reporting requirements (continued)

Requirement	Clause^	Description
Monthly report data	B26(d) B27(d) B65	The Administrator will provide a monthly report to the Commonwealth and States and Territories detailing at the LHN level the: <ul style="list-style-type: none"> • basis for the amount of Commonwealth funding into the National Health Funding Pool (the Pool) accounts; • basis for the amount of State and Territory funding into the Pool and the State Managed Fund (SMF); and • number of public hospital services funded and provided as a running yearly total as per the national system of ABF.
	B66	States and Territories will provide data to the Administrator on the: <ul style="list-style-type: none"> • flow of Commonwealth and State and Territory funds into and out of SMFs; and • provision of public hospital services by LHNs.
Data Conditional Payment	A156-159 of the Addendum	The Administrator is responsible for applying the Data Conditional Payment, a temporary adjustment to Commonwealth NHR funding (deferral of funding) resulting from late submission of the required data for Annual Reconciliation (clauses A156 to A159 of the Addendum). If an amount is deferred, the Administrator will advise the affected jurisdiction.

^Note: All clauses are from the *National Health Reform Agreement* (the Agreement), unless specified from the *2020-25 Addendum to the National Health Reform Agreement* (the Addendum).

4. Assessment of compliance

Jurisdictions are assessed as having complied with the Administrator’s data requirements if they have provided the data:

- As specified in the Data Plan and File Specification for Data Submission; and
- Within the timeframes set out in the Agreement and Data Plan.

Table 2: Data compliance and measurement

Requirement	Measurement	Due Date	Sep Quarter	Dec Quarter	Mar Quarter	Jun Quarter
Service Agreements and Data Provision						
LHN Service Agreements 2020-21 provided to the Administrator	Number of agreements submitted	Once agreed	✓	✓	✓	✓
LHN Service Agreements include number of services at the service category level to be provided by the LHN	Meets minimum requirements Yes or No	Once agreed	✓	✓	✓	✓
LHN Service Agreements include mix of services at the service category level to be provided by the LHN	Meets minimum requirements Yes or No	Once agreed	✓	✓	✓	✓
LHN Service Agreements include the level of ABF to be provided to the LHN reported on the basis of the national efficient price	Meets minimum requirements Yes or No	Once agreed	✓	✓	✓	✓
LHN Service Agreements include the level of Block Funding to be provided to the LHN	Meets minimum requirements Yes or No	Once agreed	✓	✓	✓	✓
Update to estimated LHN NWAU 2020-21	Date Submitted or No Update	Not applicable	✓	✓	✓	✓

Table 2: Data compliance and measurement (continued)

Requirement	Measurement	Due Date	Sep Quarter	Dec Quarter	Mar Quarter	Jun Quarter
Service Agreements and Data Provision (continued)						
LHN Service Agreements and estimated LHN NWAU 2020-21 aligned	Number of agreements aligned	Not applicable	✓	✓	✓	✓
Estimated State and Territory NWAU by service category 2021-22	Submitted (if so, when) or <u>Not Submitted</u>	31 Mar			✓	
Estimated LHN NWAU by service category 2021-22	Submitted (if so, when) or <u>Not Submitted</u>	31 May				✓
Public Health amounts	Submitted <u>Not Submitted</u>	Not applicable	✓	✓	✓	✓

Table 2: Data compliance and measurement (continued)

Requirement	Measurement	Due Date	Sep Quarter	Dec Quarter	Mar Quarter	Jun Quarter
Reconciliation Requirements						
Submission A	Submitted (if so, when) or <u>Not Submitted</u>	31 Dec (First-quarter)		✓		
		31 Mar (Six-month)			✓	
		30 Jun (Third-quarter)				✓
		30 Sep (Annual)	✓			
Submission B	Submitted (if so, when) or <u>Not Submitted</u>	31 Mar (Six-month)			✓	✓
		30 Sep (Annual)	✓	✓		
MBS and PBS data	Submitted (if so, when) or <u>Not Submitted</u>	31 Mar (Six-month)			✓	✓
		30 Sep (Annual)	✓	✓		
Statement of Assurance	Submitted or <u>Not Submitted</u>	With each submission*	✓	✓	✓	✓
Data Conditional Payment	Not applied or <u>Applied</u> (if so, when)	Date applied	✓	✓	✓	✓
Sentinel Events	Submitted (if so, when) or <u>Not Submitted</u>	31 Mar (Six-month)			✓	✓
		30 Sep (Annual)	✓	✓		

Table 2: Data compliance and measurement (continued)

Requirement	Measurement	Due Date	Sep Quarter	Dec Quarter	Mar Quarter	Jun Quarter
Monthly Reports						
Monthly Report Data	Submitted (if so, when) or <u>Not Submitted</u>	15 th of the next month	✓	✓	✓	✓

*Note: A Statement of Assurance is not required for the first quarter and third quarter period submission of activity data.

5. Virtual, Notional and Contracted Services LHNs

Background

The Agreement permits States and Territories to enter into agreements or contracts with private or not-for-profit providers for the provision of public hospital services (clauses A52 to A57) and for these services to be eligible for a Commonwealth funding contribution.

For practical purposes, virtual, notional or contracted services LHNs will be considered LHNs. As stated in clause A54(a) of the Agreement, 'all other clauses will apply to this LHN [notional contracted services LHN]'. Therefore, all other requirements and responsibilities outlined in the Agreement, the Addendum and the Act will apply to a virtual, notional and contracted services LHNs.

Data Provision

The data provision requirements of the Administrator from States and Territories in relation to virtual, notional or contracted services LHNs are consistent with those for other LHNs.

Service estimates

As per clause A55 of the Agreement, States and Territories 'will provide information on forecast and actual contracted activity to the Administrator, and this will include the same type, level and specificity of data on the contracted activity as required of other LHNs under this Agreement'. Therefore, service estimates relating to a virtual, notional or contracted services

LHN will be required as per the requirements and timelines outlined in clauses B73 and B74 of the Agreement, in the format and with the level of detail required by the Administrator (along with all other LHNs within the respective State or Territory).

The service estimates will be used to calculate the Commonwealth contribution to activity based funding for the virtual, notional or contacted services LHN in the same manner as other LHNs.

Service Agreements

As all other clauses relevant to LHNs will apply, the Administrator must be provided with information in respect of a **virtual, notional or contracted services** LHN consistent with that which would be contained in a Service Agreement for a 'standard' LHN. Clause D8 of the Agreement outlines the minimum requirements for Service Agreements (*Table 1: Jurisdictional data provision and reporting requirements*).

This information may take the form of a copy of the contract(s) between the State or Territory and the service provider(s) forming the virtual, notional or contracted services LHN, or appropriate extracts thereof. The contract should include required service levels and other relevant information for service providers. If these contracts are varied or amended during the course of the year (clauses B50, B51 and B57 of the Agreement), a copy of the amended contract (or relevant extracts thereof) must be provided to the Administrator for payment purposes.

6. Data compliance report timing

If a jurisdiction has not submitted the required data (*Table 2: Data compliance and measurement*), the Administrator, through the National Health Funding Body, will engage with the jurisdiction to support compliance with the Data Plan and Data Compliance Policy.

If a jurisdiction has not submitted the required data and the matter has not been resolved through bilateral discussions, the Administrator will issue a compliance warning to the relevant jurisdiction. The compliance warning will advise that if the required data is not received, the jurisdiction will be recorded as non-compliant in the Data Compliance Report.

Jurisdictions will be provided with an embargoed Data Compliance Report for review prior to the report being published on www.publichospitalfunding.gov.au. Jurisdictions will have four business days to review and provide comment prior to publication. Any changes requested by jurisdictions are subject to further consideration by the Administrator and may not be incorporated into the published report.

Table 3: Data Compliance reporting timeline

Step	Sep Quarter	Dec Quarter	Mar Quarter	Jun Quarter
NHFB reviews data submissions	15 - 20 Oct	15 - 20 Jan	15 - 20 Apr	15 - 20 Jun
NHFB engages with jurisdictions				
Embargoed Report sent to jurisdictions*	1 Nov	1 Feb	1 May	1 Aug
Report Published*	5 Nov	5 Feb	5 May	5 Aug

*Note: Next business day if this date falls on a weekend or public holiday.

Attachment A:

National Health Reform Funding table (template)

To assist States and Territories in improving their performance in meeting the Service Agreement reporting requirements of the Agreement, a suggested NHR funding table template for inclusion to 2020-21 Service Agreements is provided below.

National Health Reform Funding table (template)

Funding Type	Number of services (NWAU)	ABF NEP (\$)	Funding Allocated (\$)
ABF Allocation			
Emergency Department	xxx	xxx	xxx
Acute Admitted	xxx	xxx	xxx
Admitted Mental Health	xxx	xxx	xxx
Sub-Acute	xxx	xxx	xxx
Non-Admitted	xxx	xxx	xxx
Total ABF Allocation	xxx		xxx
Block Allocation			
Teaching, Training and Research			xxx
Small and Rural Hospitals			xxx
Non-Admitted Mental Health			xxx
Non-Admitted CAMHS			xxx
Non-Admitted Home Ventilation			xxx
Other Non-Admitted Services			xxx
Other Public Hospital Programs			xxx
CAR-T			xxx
Total Block Allocation			xxx
Grand Total Funding Allocation			xxx