



Administrator
National Health
Funding Pool

Data Compliance Policy 2019-20

August 2019

Document Control Sheet

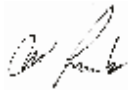
Document Information

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| Document Name | Data Compliance Policy 2019-20 |
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Change History

| Author | Date | Description | Version |
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Approval

| | |
|-----------|---|
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| Signature |  |
| Date | 30 August 2019 |

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| Title | NHFB Chief Executive Officer |
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| Date | 30 August 2019 |

Contents

| | |
|---|-----------|
| 1. Introduction | 1 |
| 2. Data cycle | 2 |
| 3. Data requirements | 3 |
| 4. Assessment of compliance | 6 |
| 5. Data compliance report timing | 10 |

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 2019-20 to 2021-22](#) (Data Plan). The objectives of the Data Compliance Policy 2019-20 (Data Policy) 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
 - Addendum to the Agreement – *Revised Public Hospital Arrangements* (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 (hereafter, States).

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 Policy is then updated as necessary, including any changes to criteria for assessing compliance.

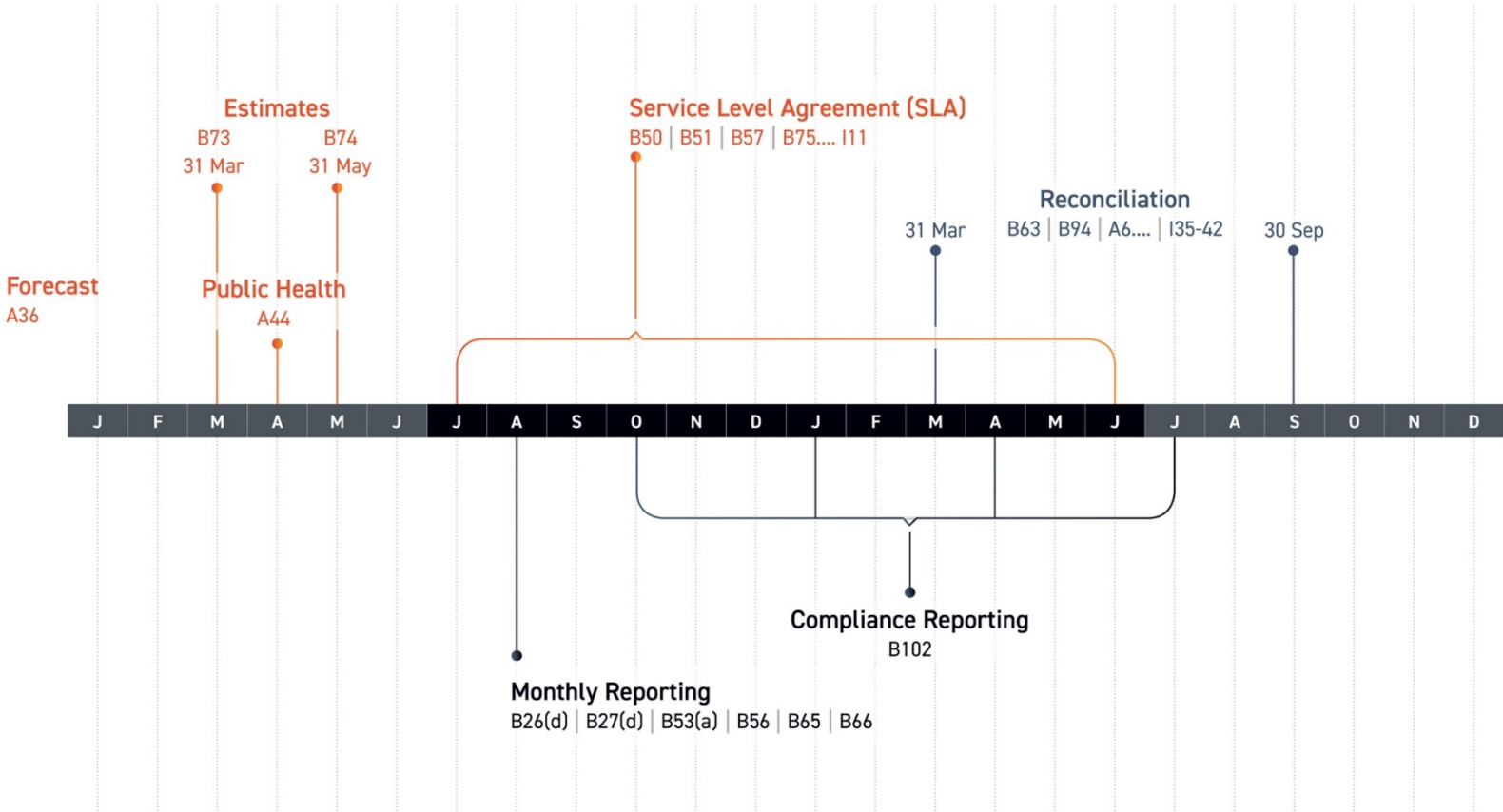
The Data Policy and associated Data Compliance Report (Compliance Report) are subject to change and may be updated and reissued by the Administrator at any point. All changes will be communicated with all stakeholders ahead of implementation.

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

Data Plan

| |
|----------|
| B85 |
| B86 |
| B88 |
| B91 |
| B92 |
| B93 |
| B95 |
| I34 |



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 Local Hospital Network (LHN) level based on projected Service Agreements (SAs) with LHNs. This is required in order to calculate and provide a formal forecast of the Commonwealth funding contribution to the Commonwealth Treasurer.
- Disaggregated unit level activity data from States. 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 MBS and 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 funding, payments and service volume.

Table 1: Jurisdictional data provision and reporting requirements

| Requirement | Clause* | Description |
|--|---------|--|
| Estimated weighted service volumes by State 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 SPP growth factor. |

| Requirement | Clause* | Description |
|--|------------|---|
| LHN Service Agreements | B75 | Jurisdictions will provide 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 and mix of services to be provided by the LHN (D8a); and the level of funding to be provided to the LHN through ABF, reported on the basis of the national efficient price, and block funding (D8c). |
| | B50 | States and LHNs can amend Service Agreements in order to adjust service volumes or pricing. |
| | B51 | States will notify the Administrator within 28 calendar days of variations to Service Agreements. |
| | B57 | States 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 I25 | 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. |
| Publication of data submission and re-submission dates | I42 | The Administrator is required to provide a 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 | I40 | States 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. |
| | I41 | <p>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).</p> <p>A Statement of Assurance is not required for the first quarter and third quarter period submission of activity data.</p> |
| 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 | I64 | States 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 | I65-69 | The Administrator may request additional data (beyond what is required under the Data Plan) be provided by the States to support the introduction of new policies such as pricing for Safety and Quality. |

| Requirement | Clause* | Description |
|--------------------------|-------------------------|--|
| MBS and PBS data | A6 | Patient de-identified data for Medicare Benefits Schedule (MBS) claims, Pharmaceutical Benefits Scheme (PBS) claims and any other Commonwealth program. This can be linked to hospital activity data provided by States using the Medicare PIN. |
| Monthly report data | B26(d) B27(d) B65 | <p>The Administrator will provide a monthly report to the Commonwealth and States detailing at the LHN level the:</p> <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 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. <p>States will provide data to the Administrator on the:</p> |
| | B66 | <ul style="list-style-type: none"> • flow of Commonwealth and State funds into and out of SMFs; and • provision of public hospital services by LHNs. |
| Data Conditional Payment | I36-39 | 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 I35 to I39). If an amount is deferred, the Administrator will advise the affected jurisdiction. |

*Note: All clauses other than those proceeded by “I” are from the National Health Reform Agreement 2011 while those proceeded by “I” are from the Addendum to the National Health Reform Agreement.

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 [data specifications](#); and
- Within the timeframes set out in the Agreement and Data Plan.

See Appendix A for the Data Compliance Report template

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 2019-20 provided to the Administrator | Number of agreements submitted | Once agreed | ✓ | ✓ | ✓ | ✓ |
| LHN Service Agreements include number and mix of services to be provided by the LHN | Meets minimum requirements Yes or <u>No</u> | Once agreed | ✓ | ✓ | ✓ | ✓ |
| LHN Service Agreements include the level of funding to be provided to the LHN | Meets minimum requirements Yes or <u>No</u> | Once agreed | ✓ | ✓ | ✓ | ✓ |
| Update to estimated LHN NWAU 2019-20 | Date Submitted or <u>No Update</u> | Not applicable | ✓ | ✓ | ✓ | ✓ |
| LHN Service Agreements and estimated LHN NWAU 2019-20 aligned | Number of agreements aligned | Not applicable | ✓ | ✓ | ✓ | ✓ |
| Estimated State NWAU by service category 2020-21 | Submitted (if so, when) or <u>Not Submitted</u> | 31 Mar | | | ✓ | |
| Estimated LHN NWAU by service category 2020-21 | Submitted (if so, when) or <u>Not Submitted</u> | 31 May | | | | ✓ |

| Requirement | Measurement | Due Date | Sep Quarter | Dec Quarter | Mar Quarter | Jun Quarter |
|-----------------------|-----------------------------------|----------------|-------------|-------------|-------------|-------------|
| Public Health amounts | Submitted <u>Not Submitted</u> | Not applicable | ✓ | ✓ | ✓ | ✓ |

| 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) | ✓ | ✓ | | |

| 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. Data compliance report timing

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

Jurisdictions will be provided with an embargoed 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: 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 Jul |
| 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.