

Staten Island PPS DSRIP Year 3, Quarter 2 APPEAL

The Staten Island PPS submitted an appeal requesting that the Independent Assessor (IA) reconsider its determination for Project 2.b.vii, Milestone 8.

Independent Assessor's Initial Determination

Required Documentation

Project 2.b.vii, Milestone 8 required the PPS to submit documentation to support that EHR meets connectivity to RHIO's HIE and SHIN-NY requirements. Of the data requirements, the PPS submitted a list/inventory of its qualified entity participation agreements of which the IA requested a random sample of 12 agreements. The PPS responded to the request and the IA determined that the PPS did not submit sample documentation for 3 of the 12 partners identified in the IA's Sample Request list. As a result, the PPS failed to meet the milestone requirements.

Initial IA Determination:

Project 2.b.vii, Milestone 8- Fail

Rationale for Initial IA Determination

Project 2.b.vii, Milestone 8

The IA did not consider this milestone complete. Of the data requirements, the PPS submitted a list/inventory of its qualified entity participation agreements of which the IA requested a random sample of 12 agreements. The PPS responded to the request and the IA determined that the PPS did not submit sample documentation for 3 of the 12 partners identified in the IA's Sample Request list. The documents submitted by the PPS did not directly respond to the IA request in that the documents did not be reconciled with the organizations requested in the sample. As a result, the PPS failed to meet the milestone requirements.

Staten Island PPS Appeal

Staten Island PPS subsequently filed a formal appeal to the IA's initial determination.

"On November 30, 2017, the PPS sent 12 QE participant agreement signature pages through the Secure File Transfer System in the file labeled "QEAgreements_2bviisamlerequest.pdf." For 4 of the signature pages, the "entity" names listed on the agreement did not match the "partner name" on the IA Sample Request list, but in the body of the note sent with the package, a written explanation was provided to show evidence that those organizations were in fact submitted. Staten Island University Hospital is owned by North Shore – Long Island Jewish Health System, now known as Northwell Health, seen on page 1 of the document, page 2 of the document is the signature page for Richmond University Medical

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Center, Carmel Richmond Healthcare and Rehabilitation Center is owned by Catholic Health Care System d/b/a ArchCare seen on page 3, and Sea View Hospital & Rehabilitation Center & Home is owned by New York City Health & Hospitals seen on page 9.”

The PPS continued to discuss this issue in its second appellate submission:

“The Staten Island PPS would like to conclude that, regardless of a crosswalk, the initial documentation submitted with the milestone during the regular quarterly reporting period listed the 12 partners. We submitted agreements for all of those same 12 partners for the sample. A crosswalk was not required for milestone completion or sample request submission.”

Independent Assessor’s Final Determination

Final IA Determination after Appeal

Upon further review and validation by the IA, the Staten Island PPS will be receiving an upheld status of **Fail** for Project 2.b.vii, Milestone 8.

Rationale for Final IA Determination

The IA accepts the PPS’ clarification in its crosswalk of the sample request and its response. It is the IA audit policy that new information cannot be accepted after adjudication or during an appellate request and cannot be used to change an original determination. The PPS failed to provide this crosswalk and clarifying information when submitting its sample response. As a result, the original determination must be upheld.