2015
Quality Management and Improvement Program
LIBERTY Dental Plan Executive Approval for 2015 Quality Management And Improvement (QMI) Program

The LIBERTY Dental Plan Dental Director has reviewed and approved this program description.

_________________________________________  03/17/15
Dental Director                     Date

_________________________________________
Board of Directors Approval

LIBERTY Dental Plan’s Board of Directors has reviewed and approved this program description.

_________________________________________  03/24/15
Executive Vice President              Date
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Purpose, Goals and Objectives

Purpose
The purpose of LIBERTY Dental Plan’s Quality Management and Improvement Program (QMI) is to ensure that quality of care provided is being reviewed by dentists, quality of care problems are identified and corrected, and follow-up is planned when indicated. The QMI program continuously and objectively assesses dental patient care services and systems, and monitors compliance with prescribed standards to ensure a constant process of quality improvement that encompasses clinical and non-clinical functions.

LIBERTY’s QMI Program is designed to provide a structured and comprehensive review of the quality and appropriateness of care delivered by the entire network of dental providers. LIBERTY documents all quality improvement initiatives, processes and procedures in a formal QMI Plan. The QMI Plan identifies and fulfills the dental healthcare needs of members, improves member accessibility to dental services, improves member satisfaction with participating providers and improves member and provider satisfaction. Functions of the QMI program are overseen by the Dental Director who ensures that day to day quality assurance functions are carried out in compliance with dental program contracts and applicable requirements.

Goal
The goal of the Quality Management and Improvement Program is to comprehensively identify and address the quality of dental care and service to our members. The program has been designed to provide a review of the entire range of care in order to establish, support, maintain and document improvement in dental care through the ongoing, objective assessment of services, systems, issues, concerns and problems that directly and indirectly impact the member’s dental health care.

LIBERTY is committed to continuous improvement in the service delivery and quality of clinical dental care provided to members with the primary goal of improving the dental health status of members and, where the Member’s condition is not amenable to improvement, maintain the Member’s current dental health status by implementing measures to prevent any further decline in condition or deterioration of dental health status. LIBERTY has established quality of care guidelines that include recommendations developed by organizations and specialty groups such as the American Academy of Pediatric Dentistry, the American Academy of Endodontists, the American Academy of Periodontists, the American Association of Oral Surgeons and the American Dental Association. LIBERTY applies these guidelines equally to general practice dentists and specialists and uses them to evaluate care provided to members.

Objectives
Consistent with the Program’s stated purpose and goal, the Quality Management and Improvement Program’s objectives are to:
MISSION

• Ensure the provision of quality dental services that focus on patient needs, comfort and function, in an environment that emphasizes safety and appropriate dental improvement by competent staff

• Ensure diagnostic evaluation and treatment is based on professionally recognized standards of care

• Provide a structure for provider education that promotes preventive services and appropriate treatment of dental conditions through the use of dental practice guidelines that optimize outcome and reduce morbidity

• Develop population-based quality indicators for assessment of dental service that are objective, measurable, and in accord with current standards of care and clinical experience

• Monitor program effectiveness and adherence to regulatory guidelines through analysis of QMI and utilization data, peer review, member and provider grievances and risk improvement issues

• Identify, document, evaluate and resolve known or suspected quality of care issues, ensuring that corrective action plans, where necessary, are adequate to bring about improvement in care in conjunction with administrative systems

• Promote patient education as a means of increasing overall dental health in compliance with preventive care standards

• Ensure professional competence through a structured and consistent credentialing and re-credentialing process

• Ensure that members receive dental services in facilities that meet appropriate standards for access, environmental health and safety/infection control

• Ensure that dental records meet established standards for accuracy, legibility and completeness

• Provide a mechanism to monitor confidentiality that LIBERTY Dental has based on HIPAA standards

• Evaluate the effectiveness of the QMI Program on an annual basis

• Provide an annual written report to the QMI Committee that addresses the Quality Improvement activities undertaken, the results of the activities and the evaluations of the status of ensuing action plans

• To provide immediate feedback for the benefit of our members through constant oversight and monitoring.
Written Member Notification

LIBERTY Dental Plan will provide all new members, and potential enrollees on request only, written member information in the form of a Member Services Guide that constitutes a fair disclosure of the provision of covered services including, but not limited to, dental health education. This guide shall meet the requirements of an Evidence of Coverage and Disclosure Form.

Written notice is provided to enrollees regarding any plan or benefit changes at least thirty days prior to the effective date. The written information shall ensure the members’ understanding of the covered services, processes to ensure the member’s ability to make informed dental health decisions, and shall be translated into LIBERTY’s threshold and concentration languages. LIBERTY shall ensure that written member informing materials shall be provided in alternative formats (including Braille, large size print, and audio format) upon request and in a timely fashion appropriate for the format being requested. Additionally, LIBERTY shall ensure that members may make a standing request to receive all informing material in a specified alternative format by documenting the member’s preferred written language and automatically providing written member information accordingly.

Confidentiality and Conflict of Interest

All Quality Management and Improvement documents, study results, audits and meeting minutes are confidential and protected from discovery by State statute. All LIBERTY Dental Plan and its delegated entities, staff and committee members will adhere to the Confidentiality and Conflict of Interest Agreements and no information may be released to any outside agency without assurance that the confidentiality of that data will be maintained, or without the permission of the originating agency or the patient. Findings, minutes and peer review evaluations from LIBERTY Dental Plan’s QMI Committee and its sub-committees are considered to be part of the LIBERTY Quality Management and Improvement Program. No person in the review process will review cases in which they were actively or personally involved. If potential for conflict of interest is identified, the involved party will be excused from discussion and review.

The Quality Management Department maintains confidentiality of information by: limiting staff access to confidential information; keeping confidential materials and documents in locked cabinets when not in use; protecting confidential QM Department letters and correspondence to providers and/or members from review; and disposing of all confidential documents and information by shredding.
**Program Scope**

LIBERTY Dental Plan maintains a comprehensive Quality and Utilization review program intended to identify, evaluate and remedy problems relating to access to care, continuity and quality of care, utilization and the cost of services. LIBERTY’s Quality Review Program includes standards, policies and procedures for credentialing and re-credentialing dentists as well as a Peer Review Committee that is utilized to conduct quality of care and utilization review compliant with applicable state and federal laws and regulations.

LIBERTY Dental Plan’s Quality Management and Improvement Program include the following components: dental management, credentialing, standards of care, dental records, utilization review, peer review, environmental health and safety/infection control, and member and provider grievances. This document describes the programs and processes that comprise this integrated effort.

- Providing immediate and responsive feedback to members, providers, and the public as appropriate.
- Policy and Procedure Development
- Annual QMI Evaluation and Report
- Annual QMI Work Plan Development
- Identification of Quality Issues and Trends
- Monitoring of Quality Measurements
- Quality of Care Focus Studies
- Monitoring of the Provider Network
- Review of Acceptable Standards of Dental Care
- Continuing Provider Educations
- Member Health Education

The QMI Program’s activities focus on the following components of quality that are included in established definitions of high-quality dental care services:

- **Accessibility of care**: the ease and timeliness with which patients can obtain the care that they need when they need it
• **Appropriateness of care:** the degree to which the correct care is provided, given the current standard of the community

• **Continuity of care:** the degree to which the care needed by patients is coordinated among practitioners and is provided without unnecessary delay

• **Effectiveness of care:** the degree to which the dental care provided achieves the expected improvement in dental health consistent with the current standard of the community

• **Safety of the care environment:** the degree to which the environment is free from hazard and danger to the patient
Program Content

The Dental Director chairs the all the committees involved in the QMI program and reports directly to the Board of Directors. All LIBERTY Dental Plan’s Quality Management and Improvement Program processes and policies are subject to ongoing review and revision by the Dental Director and the Committees involved. The QMI program employs the following four committees: Quality Management and Improvement Committee, Peer Review Committee, Utilization Management (UM) Committee and the Grievance and Appeals Committee to ensure that the dental care decisions are made separate the Plan’s administrative and financial management from the QMI structure.

- **Independent Quality of Care Review**: Each panel office shall be subject to periodic facility (structural) and patient record (process) reviews, as required by client or state, or as deemed appropriate by the Dental Director. This process is designed to assess the quality and continuity of care rendered to Plan members. Panel offices that provide orthodontic services will also be subject to a specialized review specific to the provision of orthodontic services consistent with professionally recognized standards of care. The Quality of Care Review process is intended to assess the structure, process and outcome of dental care provided under LIBERTY dental plans. The goal of the quality assessment is to expose significant deficient areas in the panel offices, so that quality improvement action leads up to professionally recognized standards. The Quality of Care Review will consist of the completed approved review tool and a written summary of the overall scope of care provided to patients assigned to the dental office.

  - Pre Contractual Facility Review: When required by client or regulation, a general dentist who has applied for provider status will have a pre-contractual facility audit as a part of the initial credentialing process or orientation process. An On-Site Assessment Structural Review audit tool will be used and the audit will be performed by a trained and calibrated procedural auditor. A non-passing score must be reviewed by the Dental Director or designee to determine whether a corrective action plan must be implemented prior to receiving active provider status.

  - Contracted Provider Periodic Reviews: when required by client or regulation or when deemed appropriate by the Dental Director, periodic quality assessments of network providers may be ordered and conducted as per existing and pertinent in-force policies and procedures.

  - Frequency of Quality Reviews: The frequency of quality reviews is determined by existing in-force policies and procedures. In some cases providers may be subject to review annually, biennially or triennially depending on the desired purpose and scope of the review, and the client or regulatory requirement.

  - Focus Reviews: In addition to routine initial and periodic reviews, the Dental Director may determine the need for focus reviews triggered by various findings such as potential quality issues (PQIs), grievances, utilization outlier status, potential fraud, waste or abuse or other reasons.
LIBERTY Dental Plan conducts, directs and supervises on-site Quality Management Reviews of provider facilities; gathers facts and information to support corrective action plans necessary to bring facilities in compliance with the Quality Management Guidelines and Standards recommended. System is monitored to ensure providers attain a sufficient level of compliance, reviews findings and actions taken on a quarterly basis or more frequently if warranted. If deficiencies and issues remain present by identified providers, LIBERTY’s UM/QM Committee determines the adequacy of any corrective action plans that may have been implemented.

The Quality of Care Review Dental for those providers identified in the Administrative Service Agreement following the Policy and Procedures of LIBERTY Dental and meeting all requirements and guidelines as specified by LIBERTY and in any applicable state and federal regulations.

- ** Credentialing:** LIBERTY Dental Plan’s Credentialing Program is designed to assure that members have access to qualified dentists who demonstrate a commitment to providing quality health services in a managed care setting. The scope of the Credentialing Program includes initial credentialing and re-credentialing at 36-month intervals of all primary and specialty care dentists listed in the Provider Directories. Pertinent findings are reviewed quarterly or more frequently if deemed necessary during QMI Committee meetings. Quality of care issues are then referred to the Peer Review Committee for recommendations.

  - ** Delegation:** LIBERTY may delegate all or a portion of its credentialing activity to a selected Credentialing Verification Organization (CVO) for those providers identified in the Administrative Service Agreement following the policy and procedures of LIBERTY Dental and meeting all requirements and guidelines in applicable state/federal regulations, and LIBERTY Dental Plan’s applicable state contracts. The Credentialing Committee will report credentialing activity quarterly at the QMI Committee meetings. LIBERTY maintains all files documenting the work that the CVO is delegated. The files will be available for plan audits and can be reviewed upon request.

- ** Peer Review:** A Prospective Peer Review consisting of a review of authorizations and patient records for appropriateness of care are completed by the Dental Director and consulting dentist. A Retrospective Peer Review is conducted by the Peer Review Committee to include the review of complaints, grievances and potential risk cases, identifying and investigating trends of questionable care. A Peer Review Presentation, based on identified opportunities for improvement is included, with the goal of examining complex cases and options for treatment across the spectrum of care. LIBERTY Dental Plan’s Peer Review activities routinely include the participation of providers and specialists when appropriate.

- ** Potential Quality Issues:** As part of LIBERTY’s Quality Management and Improvement Program, LIBERTY has policies and procedures in place that allow us to conduct investigations of Potential Quality Issues (PQIs) from a variety of sources, and to collate quality information about providers
on a regular and routine basis. LIBERTY commonly currently identifies PQIs from grievance details, grievances ruled against the provider, provider onsite assessments with a failed score, onsite assessments with a deficient critical indicator, aberrant utilization pattern, significant departure of expected contractual behavior or compliance, external vendor and business partner identification, and others as identified from time to time. The Dental Director or designee reviews each case to assess the quality of care/service provided and provides a determination for corrective action based on the severity of an individual case. Follow-up actions, including, but not limited to, provider counseling and/or Corrective Action Plans (CAPs) are required of all involved providers where a quality of care or service issue is confirmed.

All PQIs involving action or sanction on a provider are discussed at the Peer Review Committee. Peer Review Committee may provide direction or guidance in developing the corrective action or sanction. However, the final action is at the sole discretion of the Dental Director, in consultation with Legal and other business units, where appropriate.

- **Grievance**: The QMI program’s Grievance Committee investigate and resolve the issues by the management responsible for the services or operations which are subject of concern and that issues presented by LIBERTY Dental Plan members \(^1\) are resolved in a fair and timely manner. The grievance and appeal process is described in Policy and Procedure: P&P Grievance System; P&P Members Appeal Process and Policy Procedure: P&P Grievance Process (see Appendix A).

- **Independent Medical Review (IMR)**: LIBERTY will provide Members an opportunity to file for an Independent Medical Review (IMR) to provide the Member with an impartial review of the medical decision(s) made by LIBERTY related to the medical necessity of a proposed service or treatment, coverage decisions for treatments that are experimental or investigational in nature and payment disputes for emergency or urgent medical services, or any other situations required by California law or wherever else required.

  With all grievance resolution letters that LIBERTY sends to Members, LIBERTY provides the required regulatory language that advises Members that they may be eligible for IMR. Furthermore, for grievances involving delay, modification or denial of services based on a determination in whole or in part that the service is not medically necessary, LIBERTY shall include with the resolution letter an application for IMR and instructions, including the Department’s toll-free telephone number for further information and an envelope addressed to the Department’s HMO Help Center.

- **Utilization Data Review**: The goal of the Utilization Management (UM) Committee is to maximize the effectiveness of care provided to the member. The UM Committee monitors over and underutilization of services, identifies treatment patterns for analysis and ensures that utilization

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\(^1\) The term “member” includes any authorized representative (including medical practitioner, dental practitioner or attorney) acting on the member’s behalf.
decisions are made in a timely manner which accommodate the urgency of the situation and minimizes any disruption in the provision of care. The Dental Director is charged with preparation of a quarterly report containing analysis of utilization data and authorization turn-around-times for individual providers to be reviewed by the QMI Committee.

- **Access and Availability**: LIBERTY Dental Plan has established standards for geographic access and for timeliness of preventive care appointments, routine appointments, urgent appointments, emergency care, after hours care access, wait time in the provider office, and elements of telephone service. On an annual basis, data is collected and analyzed to measure performance against regulatory standards. Information is compared to Member Service Reports on access complaints and the most recent member survey data. Opportunities for improvement are identified, decisions are made and specific interventions are implemented to improve performance where needed. The effectiveness of the interventions is re-measured annually or more frequently if necessary. *(See Appendix A for applicable Policy and Procedures)* Grievance and Appeal data is included in this analysis in order to analyze trends in overturned appeals related to benefit interpretations. Compliance of Access and Availability is monitored and Corrective Action Plans are developed if deficiencies occur. Activity is reviewed by the QMI Committee quarterly, or more frequently, if necessary.

  o **Out of Network Emergency Referrals**: LIBERTY will provide prompt and reasonable reimbursement to Out-of-Network (OON) providers providing emergent or out-of-area urgent dental services to Members/Enrollees.

    Payments to OON providers shall be for the treatment of the emergency dental condition, including medically necessary dental covered services rendered to a Member to the extent necessary for the Member's emergent condition to be stabilized to sufficiently permit referral to an in-network provider, in accordance with instructions from LIBERTY. LIBERTY does not require prior authorization for emergent or urgent out of area services.

- **Health Education and Promotion/Outreach**: LIBERTY Dental Plan is committed to arranging appropriate and effective health education, health promotion and patient education programs, services and materials for its State Health Programs members based on community health, cultural and linguistic needs. These programs and resources will seek to encourage members to practice positive health and lifestyle behaviors, use appropriate preventive care and primary dental care services, as well as learn to follow self-care regimens and treatment therapies available. LIBERTY Dental will deliver organized health education programs using education strategies, methods and materials that are appropriate for the member population and effective in achieving behavioral change for improved health. LIBERTY Dental will conduct appropriate levels of evaluation to achieve health education program goals and objectives.

LIBERTY’s Health Education Department communicates with and educates its participating dental providers about available health education and improvement services and programs. On a regular
basis, the Health Education Department communicates a summary of health education and promotion activities to the QMI Committee.

- **Dental Disease Management**: LIBERTY’s innovative Disease Management Program is designed to support the clinician-patient relationship plan of care and to assist in bridging the gap between oral health and systemic health. Our Program emphasizes prevention of disease-related exacerbations and complications using evidence-based practice guidelines and patient empowerment tools. The goals of this program include improving patient self-care through education, monitoring, and communication. Improving communication and coordination of services between patient, dentist, physician and plan. And, improving access to care, including prevention services as a part of our quality initiative, LIBERTY works closely with our client partners regarding the coordination and implementation of this Program.

- **Cultural and Linguistic**: LIBERTY Dental establishes processes and procedures for providing support, maintaining compliance and creating cultural awareness for all members, providers and associates. As part of the C&L program assessment of language (spoken and written), race and ethnicity information is gathered and analyzed. LIBERTY will monitor and assure that its delegated entities provide all services, conform to regulations, and develop all reports and assessments as specified by applicable regulations and agencies.
Program Components

LIBERTY Dental Plan’s Quality Assessment Process Improvement Program is a comprehensive approach to Quality Assurance. The QMI encompasses an array of well-defined processes and functions that are critical to the delivery of dental services. Each QA activity is executed with the ultimate goal of maintain or improving the overall health of members. LIBERTY examines monitors and revises processes within the QMI Program to ensure the highest quality of care.

Provider Collaboration

LIBERTY’s quality improvement goals are to join forces with providers to actively improve the quality of care provided to members. LIBERTY contracted providers are contractually required to cooperate with ongoing QMI goals. LIBERTY’s Provider Relations staff is responsible for the ongoing communications of quality assurance activities through the following means:

Quality assurance activities are continuously communicated to providers through our Provider Relations staff. Various communication platforms are not limited to the following:

- Initial and continuing training programs
- Provider newsletters and Fax Blasts
- Online notices,
- Local and Regional meetings to discuss and identify issues relating to claims, enrollment and any other issues that the provider can identify.
- Provider Satisfaction Surveys
- Onsite office visits

Quality Improvement

The approaches that LIBERTY takes in clinical and non-clinical functions of QMI with the tangible concept of continuous quality improvement and total quality management as opportunities for improvement are limitless. LIBERTY’s approaches include, but not limited to:

- Evaluating performance using objective quality indicator data;
- Fostering data-driven decision making;
- Recognizing that opportunities for improvement are limitless;
- Soliciting Member and network Provider input on performance and QMI activities;
- Supporting continuous ongoing measurement of clinical and non-clinical effectiveness and Member satisfaction;
- Supporting programmatic improvements of clinical and non-clinical processes based on findings from ongoing measurements; and
- Supporting re-measurement of effectiveness and Member satisfaction, and continued development and implementation interventions as appropriate.
CQI/TQM principals are applied towards the progression of improvements through training and ongoing participation in quality assurance activities. LIBERTY builds upon the following principles:

- Strong leadership at all levels then are able to convey the goals and objectives of the QMI
- The three dimensions of quality:
  - People
  - Processes
  - Informed decision making
- Cohesive understanding of systems and processes that lead to quality improvement decisions

**Work Plan**

LIBERTY documents all QMI improvement initiatives, process and procedures, defines goals, objectives, specific activities, responsible parties and targeted timeframes for completion or resolution of activities. The Work Plan is developed annually with National Committee for Quality Assurance (NCQA) best practice standards simulated for dental services and built upon the evaluation, recommendations and findings of the previous year’s Work Plan.

LIBERTY’s Work Plan focuses on the accessibility, availability, appropriateness, continuity, effectiveness, and timeliness of dental care as well as the safety of service delivery environment. The Work Plan encompasses the following distinct functions that mirror applicable NCQA components for the delivery of care:

**Policy and Procedure Review**

LIBERTY ensures quality of care through policies and procedures that direct day-to-day operations. All policies and procedures are at a minimum reviewed annually by the Policy and Procedure Committee at the direction of the Dental Director. New policies and procedures are written and adopted through the P&P Committee as they are approved. Ongoing revisions of existing policies and procedures are completed as processes are updated and taken before the appropriate committee bodies for approval.

**Annual QMI Evaluation and Report Summary**

The Dental Director and Quality Assurance staff evaluates the QMI Plan annually to appraise the effectiveness of the previous year’s clinical and non-clinical initiatives, including but not limited to the following:

- Adherence to QMI standards, policies and procedures
- Development of quality initiatives that support data-driven decision-making and support continuous ongoing measurement and re-measurement of clinical and non-clinical effectiveness
- Member and Provider satisfaction;
- Development and implementation of programmatic improvements to clinical and non-clinical processes, based on results from ongoing measurement;
- Results of focused quality of care studies and other quality initiatives
- Effectiveness of corrective action plans.
Approximately three months prior to the end of each contract year, LIBERTY reviews the Plan to identify issues and potential revisions, incorporating the concerns and feedback from staff, customers, members, and providers. The Quality Management and Improvement Committee (QMI) is presented with the evaluation report, which is reviewed to formulate recommendations for continuous process improvement revisions. After the revisions have been approved, they are formally presented to the Board of Directors for review and approval. All approved revisions are incorporated into the Work Plan, and distributed to employees and plan partners, as appropriate.

The QA Department also prepares an annual report that summarizes the previous year’s quality activities. The Dental Director and QA Coordinator will prepare the first draft of the annual report. The report will summarize the overall effectiveness of the previous year’s Work Plan. Once finalized, it is reviewed by the dental director and presented to the QMI for first-level review and approval. The Annual QMI Evaluation and Report includes but is not limited to the following:

- Results and outcomes of internal performance
- Focused quality of care studies
- On-Site visits
- Effectiveness of provider reviews
- Potential Quality of Care Issues
- Grievances
- Member/Provider Satisfaction Survey results

**Annual QMI Work Plan**

On an annual basis, the QA Department develops a QMI Work Plan to assist with the following tasks:

- Documentation of the next year’s goals and objectives for planned projects and activities, including clinical and non-clinical programs, initiatives and measurement activities
- Required effort to accomplish stated goals and objectives;
- Identification of tasks and subtasks according to a work breakdown structure
- Allocation of resources, task planning and scheduling
- Monitoring and control of task progression
- Preparation of the Annual QMI Evaluation and Report

The overall goal of the QMI Work Plan is to support program improvement of clinical and non-clinical processes based on the previous year’s findings from ongoing assessments. The completed Work Plan, which is approved by the Dental Director, the QMI Committee and the Board of Directors. This allows an opportunity for evaluation and coordination of QMI activities throughout LIBERTY.

**Identification of Quality Issues and Trends**

Though the identification potential quality issues is every employee’s responsibility, the QA Department serves as the primary source of data related to the quality of services provided. A utilization management analyst generates quarterly reports to assist in the identification of trends specifically, underutilization and overutilization of services. Quality issues and trends are also identified by QA staff.
through input from other Departments during scheduled staff meetings and the review of member and provider grievances, and satisfaction survey result. The QM/UM Work Group ensures immediate feedback on issues related to quality of care, access & availability, grievances and identifying potential sentinel events proactively.

**Measurement Monitoring**

LIBERTY assesses clinical and non-clinical aspects of quality activities and performance improvement by monitoring and evaluating performance using objective quality indicators of which identify required measures and corresponding opportunities for improvement. The quality indicators are used in the development, assessment and modification of the QMI Program. LIBERTY also complies with standards developed by NCQA and the American Dental Association to ensure that measures reflect best practices of dental health care. Automated reports are generated from LIBERTY’s management information system, along with satisfaction survey results, to evaluate dentally appropriate measures. As directed by the Dental Director the QA Coordinator ensure that all aspects of monitoring and evaluation meet applicable state and federal privacy/confidentiality laws and that reports of such activities are delivered to the QMI Committee, health plan partners and regulatory agencies, as required.

LIBERTY will conduct annual member and provider satisfaction surveys. Other opportunities to implore member and provider input include, but are not limited to, the following:

- **Member Call Center calls**
  - Correspondence sent to our Member Services Department
  - Grievance and appeal actions
  - Outreach activities

- **Provider Call Center calls**
  - Training seminars
  - Visits to provider offices
  - Local/regional meetings
  - Participation in dental associations and other dental organizations.

**Focused Quality of Care Studies**

LIBERTY conducts focused quality of care studies on a regular basis to evaluate clinical outcomes of dental service delivery. LIBERTY proactive approach to quality of care benefits everyone and focused quality of care studies play an integral role in improving the oral health outcomes. The Dental Director and the QA Coordinator are actively involved in each study’s development, analysis and interpretation. LIBERTY performs such studies in accordance with the Centers for Medicare & Medicaid Services’.

**Provider Network Monitoring**

LIBERTY has extensive experience in developing and maintaining provider networks that offer members the full scope of each plan’s benefits, as well as adequate access to those benefits. Our approach for monitoring each aspect of service delivery includes:

- Each provider’s completion of a Participating Provider Agreement
Scope

- Distribution of a LIBERTY Provider Handbook to each provider
- Each applying dentist’s completion of a provider profile form, which gives us the information needed to conduct a first-level assessment of the dentist’s qualifications
- A comprehensive credentialing process that adheres to NCQA standards
- Targeted structural and/or process audits of providers who have been identified through utilization analysis and grievance and satisfaction data as having potential quality issues
- Random structural reviews that assess the provider’s physical facility, as well as the provider’s office protocols regarding emergencies, booking appointments, sterilization and related procedures
- Chart audits that assess the provider’s process of care and conformity with professional dental practice, appropriate dental management and quality of care standards
- Biannual re-credentialing of each network provider
- A formal provider dispute resolution process
- Establishing provider quality improvement goals in areas in which the provider does not meet LIBERTY’s standards or improvement goals.
- Developing and implementing incentives, both financial and non-financial incentives, to motivate Providers to improve performance on profiled measures.

Provider Profiling
LIBERTY conducts Provider profiling activities at least on an annual basis. LIBERTY utilizes a provider profiling process that is an important provider-level quality improvement activity, as well as an opportunity to internally track and trend data over a set period of time to identify possible areas of improvement. It is also a tool to make meaningful comparisons based on a varied data set including claims data, authorization data, quality reports and demographic information.

Provider profiling activities include developing Provider-specific reports that include a multi-dimensional assessment of a Provider’s performance using clinical, administrative, and Member satisfaction indicators of care that are accurate, measurable, and relevant to the enrolled population. Provider, group, Statewide and regional benchmarks are established for areas profiled, where applicable, including Dental Program-specific benchmarks. The individual providers receive feedback from LIBERTY regarding the results of their overall performance of the Provider Network. The results from the Provider Profiling activities are also used to identify the areas of improvement for the contracted Providers. On a quarterly basis, LIBERTY measures and reports on the Provider Network and the provider’s progress, or lack of progress, towards the improvement goals to the QMI Committee.

Standards for Clinical Criteria & Guidelines/Practice Parameters
LIBERTY’s QMI Program is comprised of the following guidelines and professional standards of care:

- NCQA Standards for the Accreditation of Managed Care Organizations
- HEDIS data collection requirements
- State dental association guidelines.
LIBERTY uses NCQA standards to assess performance for the delivery of health care services. The QMI Program also incorporates applicable HEDIS measures, national and state guidelines and federal and state laws and regulations to ensure compliance with requirements.

In establishing standards for acceptable care, LIBERTY also gathers input from staff dental consultants with expertise in various dental specialties (such as pediatric dentistry, oral surgery, orthodontics, prosthetics and endodontics), participating providers and dental school faculty, as well as regulations promulgated by government agencies such as state dental examiner boards and state departments of insurance. Additional resources include guidelines developed by organizations and specialty groups such as the American Academy of Pediatric Dentistry, the American Association of Endodontists, the American Academy of Periodontology, the American Association of Oral and Maxillofacial Surgeons and the American Dental Association. These resources provide information and recommendations on generally accepted standards of care and the latest treatment options and techniques.

**Corrective Action Plans**

The Dental Director can recommend remedial action in the form of corrective action plans and follow-up whenever inappropriate dental care is identified, overutilization of services that unfavorably affect patient care, underutilization of needed services, insufficient accessibility or availability of services, inappropriate referral practices or breaches in LIBERTY policy regarding benefit applications and charges. On approval corrective action begins with notifying the provider of the observed deficiencies and providing an explanation of actions required or recommended to correct the deficiencies.

Corrective measures may include one or more of the following:

- Clinical peer review
- Special claims review
- Referral to the applicable state dental board
- More on-site assessments
- Mandatory prior authorization
- Member enrollment restrictions
- Termination of the provider agreement.

**Utilization Management**

LIBERTY’s Utilization Management (UM) program ensures access to care while maintaining quality and cost effectiveness. One of our primary responsibilities is to conduct utilization reviews to determine whether treatments meet each plan's criteria and generally accepted standards of care. We determine whether or not to authorize, modify or deny dental services based on review of radiographs, if required, and other information provided by the treating dentist.

Other UM activities include:

- Establishing dental necessity criteria;
- Establishing thresholds for acceptable utilization levels;
• Implementing mechanisms to evaluate overutilization and underutilization;
• Determining sanctions for provider noncompliance;
• Identifying potential quality issues and referrals to the QIC;
• Conducting structural reviews of newly enrolled providers’ offices, along with targeted onsite reviews;
• Conducting peer review of UM activities through the evaluation of utilization reporting, appeal requests and provider profiling and
• Reporting to the QIC and dental director regarding overall UM program effectiveness.

The process of waste, abuse and fraud detection provides an excellent example of how the UM program operates within the QA Department. Suspected cases of waste, abuse or fraud often originate in the QA Department because, organizationally, the Department is tasked with monitoring provider and member activity to detect inconsistencies with sound medical, the potential for increased resource consumption resulting from reimbursement for unnecessary dental care and underutilization and overutilization trends.

**Educational Activities**

LIBERTY conveys information to providers, members and staff to help ensure their understanding of clinical and administrative issues. Provider Relations Department coordinates and implements training sessions and continuing education seminars for providers. The Member Service Department creates and disseminates preventive health education brochures to members and also trains Call Center Representatives of each program’s requirements in order to foster interact confident and knowledge interaction with members and providers on the telephone.

While the QA Department has no direct responsibility for educational activities, it tracks these activities because they are an integral component of many quality improvement initiatives; such as with member and provider satisfaction surveys results which are used identify topics for future educational activities.

**Annual QMI Program Evaluation**

The Quality Management and Improvement Program document and the effectiveness of the program are reviewed, evaluated and revised on an annual basis. Results of the evaluation are used to formulate corrective actions needed for the next year’s program and are the basis of the programs work plan. The annual evaluation, revised program and work plan activities are submitted to the QMI Committee of LIBERTY Dental for review, input and reporting to the board of directors for approval. The Evaluation is available, upon request in any required format and timeframe specified by any Health Plan Partner or Government Agency.
QUALITY IMPROVEMENT PROCESS
Quality Improvement Monitoring and Evaluation

LIBERTY Dental Plan’s Quality Management and Improvement Program make the most of an integrated approach to the process of quality improvement. The 2014 QMI Program incorporates activities and information from its delegated administrative service organizations, in order to establish a high level of quality care that ensures patient safety and the delivery of dental services that meet professionally recognized standards. Specific oversight of the delegated entity is described in LIBERTY Dental Plan’s Policy and Procedures, Delegation of Utilization Management Oversight and Delegation of Quality Management Oversight (see Appendix A).

- **Problem Identification** – The Quality Management and Improvement Program uses multiple avenues to identify opportunities to improve care and service including, but not limited to, data analysis from all departments, dental record audits, focused studies, credentialing information, and complaints and grievances.

- **Prioritization** – The QMI Program prioritizes identified opportunities for improvement based on acuity, prevalence, risk, practice standards, and available resources described on the annual QMI Work Plan.

- **Indicator Development** – Indicators are selected to monitor important aspects of care and service. An indicator may be utilized to monitor more than one aspect of care or service. Performance goals are established for each indicator or study.

- **Data Sources** – Data analyzed in QMI activities may include membership data, utilization and claims data, referral patterns, survey data, complaint and grievance data.

- **Data Collection, Analysis and Reporting** – For each QMI activity, the most representative data is selected, information is compiled, results analyzed and reported. QMI staff interfaces with other involved departments to coordinate and collaborate on study design and analysis.

- **Development of Improvement Plans** – Following analysis of collected results, the QMI Committee performs barrier analysis to identify opportunities for improvement. Individuals or teams affiliated with the specific process being evaluated are assigned responsibility for development and implementation of improvement plans.

- **Evaluation of Improvement Plans** – Monitors are built into all improvement plans and are tracked through the QMI Work Plan to assess effectiveness.
• **Provider Feedback/Performance Assessment** – At the conclusion of QMI Program activities, results are disseminated to dental care providers, along with expectations for improvement, and opportunities for assistance from LIBERTY Dental in formulating improvement plans.

• **Disciplinary Action** – When LIBERTY Dental Plan identifies a quality issue or trend that is severe enough to be reportable, the QMI Committee acts in accordance with the Corrective Action Policy and Procedures (see Appendix A). This includes the judicial review procedure, if requested by the provider. Corrective action will be reported to the State Board of State Examiners and the National Practitioner Data Bank.
Authorization, Accountability, and Leadership

The LIBERTY Dental Plan Board of Directors has ultimate responsibility for the quality of care and service delivered to the members and retains overall responsibility for the Quality Management and Improvement Program. The Board delegates oversight of the Program to LIBERTY’s Dental Director. The Dental Director delegates specific responsibilities to the QMI Committee and its Sub-Committees.

The QMI Committee is responsible for annual review of the Quality Management and Improvement Program. The Chief Dental Officer/Dental Director, who is the senior dental executive with responsibility for LIBERTY Dental Plan’s Quality Management and Improvement Program, delivers the annual written report on the status of QMI activities to LIBERTY Dental Plan’s Board of Directors. The results of the annual reviews are noted in the minutes of QMI Committee meetings, which are available for inspection by governmental and independent auditors.

LIBERTY Dental Plan’s QMI Committee and any delegated entities to which QMI responsibilities have been delegated shall meet quarterly or more frequently if problems have been identified, to oversee their respective QMI program responsibilities. At the quarterly meeting, the delegated entities will report findings and actions taken, and if deficiencies and issues exist, identify the specific providers or dental care process issues that present new or chronic quality of care issues, as appropriate.

The QMI Committee incorporates into its assessment any information it receives on the results of LIBERTY’s Peer Review Committee and various regulatory agencies, and ensures that any identified issues are addressed with LIBERTY Dental Plan’s Dental Director, with recommendations for appropriate Quality Management and Improvement Program modifications. This process is designed to facilitate a rapid response to identified concerns, in order to maintain a program that effectively and efficiently monitors the quality of dental care.

Listed below is a summary of the committees and staff who are charged with directing LIBERTY Dental Plan’s QMI Program. The Utilization Management/Quality Management and Improvement Committee (QMI) membership consists of:

- The LIBERTY Dental Plan Dental Director
- LIBERTY Dental Consultants
- A general dentist(s) representative provider from each of LIBERTY’s Dental Plans.
- Specialty Dentist active with LIBERTY Dental
- Non-practitioner members will include LIBERTY Dental QMI staff and the Operations Manager
- From time to time, the Committee reserves the right to invite Ad Hoc external providers or additional dentist or staff involved with the QMI Program.
**Oversight**

LIBERTY Dental Plan’s Quality Management and Improvement Program enlist the expertise and guidance of various quality-related departments throughout LIBERTY Dental Plan. Membership of the QMI Committee consists of representatives from quality departments that support LIBERTY Dental Plan and are listed below:

- LIBERTY Dental Director
- Utilization Management Dental Director
- Chief Operating Officer
- Vice President Professional Services
- Director of Claims
- QM/UM Manager
- Credentialing Coordinator
- Contract/Network Manager
- Supervisor, Member Services
- Compliance Manager
- Grievance and Appeals Manager
- Dental Consultants

From time to time, the Committee reserves the right to invite ad hoc external providers.

**Sub Committees**

The Peer Review Committee membership consists of:

- The LIBERTY Dental Plan Dental Director
- LIBERTY Dental UM Dental Director
- General dentists, who participate as a LIBERTY Dental provider.
- Five specialty dentists (Periodontist, Endodontist, Orthodontist, Pedodontist and an Oral Surgeon) will be available to the committee as consultants, as appropriate to the cases scheduled
- Non-practitioner members will include the QMI staff and Dental Operations Manager
QUALITY IMPROVEMENT ORGANIZATIONAL STRUCTURE
Organizational Structure

Staff Resources and Accountability

LIBERTY Dental Plan's quality improvement resources are designed to meet its enrollees' needs and to effectively carry out all designated QMI Program functions including the development, implementation, and evaluation of quality improvement program activities. The senior leadership of LIBERTY Dental Plan consists of experienced, well-qualified administrative and clinical leaders with a commitment to the delivery of quality care and service.

Administrative Service Organizations

LIBERTY Dental has provided staff resources and a structure required to provide quality management, continuity of care, utilization management, grievance and appeal systems, and access and availability of services. There is a written, executed agreement between the plan and each delegate that includes the delegated entities specific responsibilities to monitor the quality of care and services rendered.

The responsibilities of the delegated entities include, but are not limited to:

- Compliance with LIBERTY Dental Plan Policies and Procedures when performing delegated responsibilities
- Participation in QMI and Peer Review Committees
- Provide quarterly, or more frequently if appropriate, reports to the committees to facilitate the Plan's evaluation of complaints, assess trends, and implement action to correct identified problems
- Identify and present to the Committees opportunities for improvement and to monitor interventions assuring that the improvement activities are implemented and effective

The qualifications and educational requirements for LIBERTY Dental Plans key staff, committees, and bodies responsible for quality improvement activities include the following key roles:

Dental Director

The Dental Director is instrumental in driving how to develop and manage programs, centered on continuously evaluating and improving our clinical model and how participation in the delivery of dental benefits solutions. The Dental Director collaborates with other health care providers in reviewing actual and proposed dental care and services against established criteria guidelines. This position also supervises and coordinates activities under the Utilization Management (UM) Program including prior authorizations, dental review and review under the guidance of the criteria established by the UM committee. Qualifications for this position include:

A current, valid state license to practice dentistry,
At least five years' experience in the active practice of dentistry,
and a thorough understanding of the delivery of dental managed care.
Dental Consultant

The Dental Consultant is responsible for the determination of Quality Management (QM) cases (i.e. enrollee, grievances, second opinion request, pre-determination of benefits, provider disputes, regulatory complaints, and related appeals). The Dental Consultant collaborates with other health care givers in reviewing actual and proposed dental care and services against established criteria guidelines. Qualifications for this position include: A current valid state license to practice dentistry, At least five years’ as a practicing dentist, and knowledge of current dental terminology, practices, materials, and generally accepted standards.

Compliance Manager

The Compliance Manager is responsible for all phases of project management for regulatory and client contract compliance audits. The Compliance Manager creates and implements internal controls to ensure compliance with federal and state laws and regulations. Responsibilities include planning, directing, and completing compliance audits. Qualifications for this position include: A JD, MBA or other advanced degree; 5-7 years of progressive experience delivering and managing compliance audit services with experience in a healthcare setting; Experience with Medicare programs; Familiar with HIPAA regulations and other federal and state laws that pertain to healthcare. In addition, experience performing healthcare audits and managing corrective action plans is required.

- Excellent Computer Skills mainly with Microsoft Applications.
- Project Management experience.

Manager, Quality and Utilization Management

The Manager of Quality and Utilization Management is responsible for managing Quality, Utilization, and Case Management operations in accordance with LIBERTY Dental Plan’s policies, procedures, and processes. Qualifications for this position include:

- Bachelor’s Degree, in a Healthcare related field., a thorough understanding of dental benefit plan administration including federal CMS, managed care, a minimum of 3-5 years in UM/QM or case management experience.

Director of Member Services

The Director of Member Services has an overall strategic and operational responsibility for Member Services and Fulfillment. This position provides direction and leadership toward the achievement of the organization’s philosophy, mission, strategy and its goals and objectives. Manages daily activities of Member Services and Fulfillment departments while ensures the highest level of customer satisfaction, accuracy and compliance with all reporting benchmarks. Also oversees long-term planning, technology strategies and continuous improvement of operational efficiencies. Keeps current on State and Federal regulatory issues and industry activities and trends and is responsible for regulatory reporting. Diligently works to foster a positive and cohesive work environment, while ensures exemplary service is provided to all customers. Qualifications for this position include: A BA/BS or 10 years of Management
QUALITY IMPROVEMENT ORGANIZATIONAL STRUCTURE

Experience in Dental Insurance, and at least 7 years of experience in a managerial capacity with a minimum of 5 years in healthcare administrations/operations role

**Director of Professional Relations**

The Director of Professional Relations directs the recruitment and retention of all LIBERTY proprietary provider networks in the assigned region(s), develops provider reimbursement schedules by product and region and maintains mandated regulatory requirements. Qualifications for this position include a BA/BS degree and/or preferably an RDA or RDH license or equivalent; a minimum seven years in healthcare or dental insurance experience, and previous management and network development experience.

**Director of Claims**

- The Director of Claims directs the Claims Department, to ensure quality standards are met and the best possible service is provided to our customers. Provides strategic leadership to operations including; long-term planning, technology strategy, and continuous improvement of operational efficiency. Qualifications for this position include a BA/BS Required, with an MBA of other advanced degree in Healthcare preferred; A minimum of 7 years of experience in a managerial capacity with a minimum of 5 years in health plan/operations role, and Claims experience in healthcare environment.

**Manager, Grievance, Appeals and Quality Management**

The Manager of Grievance, Appeals and Quality Management (G&A, QM) manages all aspects of the Plan’s grievance system, which consists of member grievances and appeal, as well as provider disputes. The Manager, G&A, QM ensures that cases are resolved in compliance with all applicable state and federal regulations and in accordance with client-specific requirements across all lines of business. This position also supports the Plan’s Quality Improvement Program and functions by managing staff contributing to multiple QM Committees and Functions. Qualifications for this position include BA/BS Degree preferred; a minimum seven years in healthcare insurance, (dental preferred.), and Quality Management and/or Compliance background preferred.
QMI Committee Responsibilities

The Quality Management and Improvement Committee are responsible for the development and implementation of policies and procedures that establish processes and monitoring mechanisms for:

- Member grievances
- Member accessibility of services
- Confidentiality of patient information
- Assessment of patient satisfaction
- Audit standards
- Linkage between utilization management, administrative and QMI functions
- Assessment of provider satisfaction
- Utilization analysis
- Evaluation of clinical issues
- Program guidelines
- QMI Processes and Studies (audit results, quality and outcome studies/results and studies overtime)
- Panel Recruitment and Retention Summaries
- Health promotion activities targeting the enrolled population

At the quarterly meeting, the delegated entities will report findings and actions taken, and if deficiencies and issues exist, identify the specific providers or dental care process issues that present new or chronic quality of care issues, as appropriate.

A quarterly report summarizing the QMI Committee activity will be prepared by the LIBERTY Dental Director and submitted to the QMI Committee of LIBERTY Dental. Annually, a summary of the data reported for the year's work plan objectives will be presented to the QMI Committee of LIBERTY Dental and forward to the Board of Directors. This report will indicate trending of clinical services, quality indicators and other relevant performance data. It will measure improvements in accessibility, availability and quality of care. It will cite evidence that supports the goal of the QMI Program to contribute to improvement in care and services. LIBERTY conducts additional performance measurements and performance improvement projects as appropriate to meet federal and state program requirements, including CMS.

The committee will meet a minimum of four times per year. Contemporaneous minutes will be taken and maintained by designated dental staff. Voting rights are limited to dentists. Each member of the QMI Committee shall abide by a Confidentiality and Conflict of Interest Disclaimer.

The QMI Committee quarterly receives verbal and written reports from the Dental QMI Committee to which it has delegated responsibility for on-going dental quality improvement activities. They retain the responsibility for the review of programs and activities and recommend changes that will improve the care delivered to members. In addition, the QMI Committee has the following functions specific to dental quality improvement:
QUALITY IMPROVEMENT ORGANIZATIONAL STRUCTURE

- Reviews all QMI Programs, Work Plans, Annual Evaluations, and Quarterly Reports
- Provides feedback and recommendations to the committees after reviewing submitted reports and directs action to be taken independent of the Dental QMI Committee when provided with opportunities to improve care and service or resolve issues/problems
- Assures that resources and systems are available to support the Quality Management and Improvement Programs
- Provides reports, information and linkage with other quality related committees and to the Board of Directors

Dental Peer Review Committee Responsibilities

The responsibilities of the Dental Peer Review Committee shall include, but not be limited to, the following:

- Review of provider Quality of Care issues identified through various means, including, but not limited to, enrollee grievances and on-site audits
- Review of Utilization Management reports to identify Quality of Care issues
- Review of malpractice and National Practitioner's Data Bank reports
- Review of provider appeals (i.e., grievance resolution, terminations, denial for panel participation)
- Review of Quality Management study and audit results, performing the function of barrier analysis and development of interventions at the direction of QMI staff

The Committee members shall meet at least twice every calendar year, or as specifically required to review cases. The Dental Director shall designate the time and place for Committee meetings and provide written notice and relevant documentation to the Committee members. The Dental Peer Review Committee shall report its findings to the Dental QMI Committee. Voting rights are limited to dentist members. A quorum, which will be required to conduct business, will consist of at least one third of the members and at least one dentist. Each member of the Dental Peer Review Committee shall abide by a Confidentiality and Conflict of Interest Disclaimer.
Appendix A: Reference Documents

*Complete listing of LIBERTY Dental Policies & Procedures is available on LIBERTY’s Internal Policy Drive:

- Annual QM UM Work Plan Program
- Standards of Care (ADA Guidelines)
- QM/UM Organizational Structure
- QM/UM Committee Responsibility
- Quality Management Committee
- Handling and Recording Dental Records
- Inter-Rater Reliability Dental Records
- General Anesthesia and IV Sedation for Oral Maxillofacial Surgery and Pediatric Dental Services
- Continuity and Coordination of Care
- Dental Director Oversight
- Peer Review Committee Guidelines
- Satisfaction with The UM Process
- Provider Re-credentialing
- Credentialing & Re-Credentialing
- Credentialing Review
- Delegation Oversight Credentialing
- Provider Credentialing
- Provider Network Verified
- Provider Performance
- Grievance Tracking & Trending Analysis
- Member Appeals Process
• Delegated Entity Oversight Grievances
• Members Appeal Process
• Grievance Form Availability
• Grievance Quarterly Reports on Complaints Grievance Process
• Grievance System
• Inter Rater Reliability Program
• Inter Rater Reliability Program Certification & Recertification of Staff
• Case Management & Special Needs
• UM Review Criteria Referral Review Approve Modify or Deny
• Criteria for Dental UM Development & Application
• Standards of Care (ADA Guidelines/Criteria Development)
• Clinical Criteria for UM Decisions
• Timeliness Standards for UM
• Review and Updates of the Dental Utilization Management Plan
• Emergency Dental Services
• Reimbursements of Non-Plan Providers for Emergency Dental Services
• Emergency Specialty Referrals
• Compliance Assessment & Evaluation
• Compliance Internal Audit Process
• Corrective Action Quality Improvement & Follow-Up
• Member Access to Providers Geo-Access Monitoring PCD
• Member Satisfaction
• Standards for Primary Care Dental Provider Network Access
• Telephone Access Standards
• Access & Availability Guidelines
• Specialist Distribution Standards
• Standards for Appointment Availability
• Standards for High Volume Specialists
• Interpreters & Delegation Oversight Certified Translation Services
• Translation of Written Informing Materials
• Translation Procedure
• Access to Interpreter Services for Limited English Proficient Subscribers
• C & L Compliance
• Culturally Competent Care
• Identification & Record Maintenance of LEP Subscribers Language Needs