



KERN HEALTH SYSTEMS POLICY AND PROCEDURES			
<b>Policy Title</b>	Community Supports Services (CSS) Data Sharing	<b>Policy #</b>	17.05-P
<b>Policy Owner</b>	Community Supports Service	<b>Original Effective Date</b>	01/01/2022
<b>Revision Effective Date</b>	6/9/2025	<b>Approval Date</b>	09/05/2025
<b>Line of Business</b>	<input checked="" type="checkbox"/> Medi-Cal <input type="checkbox"/> Medicare <input type="checkbox"/> Corporate		

## I. PURPOSE

To define the process by which Kern Health Systems (KHS) and contracted CSS Community Based Organizations (CBOs) will share and access information regarding Community Supports benefits and services. The policy addresses privacy, data governance, legal compliance and secure data exchange between KHS and CBOs.

## II. POLICY

KHS will develop data sharing relationships and requirements for secure, lawful and appropriate sharing with CSS CBOs in compliance with the Department of Health Care Services (DHCS) requirements, HIPAA, and other federal and state regulations.

## III. DEFINITIONS

TERMS	DEFINITIONS
HIPAA	Health Insurance Portability and Accountability Act, a 1996 Federal law that restricts access to individuals' private medical information
CSS Team	Internal KHS Staff working to assign Members identified for CSS, coordinating with CSS Community Based Organizations (CBOs), and connecting Members to all available resources.
PBM	Pharmacy Benefit Managers, or Management

## **IV. PROCEDURES**

### **A. Data System Requirements and Data Sharing to Support CSS**

1. KHS will use Electronic Medical Record (EMR) systems and processes capable of tracking CSS referrals, and grievances and appeals.
  - a. All data collected during CSS Member interactions will be stored securely by the CSS CBO in their EMR or other electronic records system.
  - b. To request a CSS authorization, the CSS CBO will access the provider portal and complete a referral assessment for the Member. Based on the answers of the assessment questions, the system will then create an outpatient (OP) episode and auto approve if the Member meets the determined criteria. If the Member does not meet the determined criteria, the system will pend the referral to the CSS Team for review and consideration. Once a decision has been reached, the CBO will be notified via the Secure File Transfer Protocol (SFTP) process. The CSS CBO can also review the authorization via the Provider portal.
  - c. Information collected in the CSS CBO EMR will be used for reporting to KHS, as required for clinical quality improvement and care management activities.
2. As part of the referral process to CSS CBOs and consistent with federal, state and, if applicable, local privacy and confidentiality laws, KHS will ensure CSS CBOs have access to:
  - a. Demographic and administrative information confirming the referred Member's eligibility and authorization for the requested service
  - b. Appropriate administrative, clinical, and social service information the CSS CBOs may need to effectively provide the requested service; and
  - c. Billing information necessary to support the CSS CBOs' ability to submit claims or invoices
3. KHS will use defined federal and state standards, specifications, code sets, and terminologies when sharing physical, behavioral, social, and administrative data with CSS CBOs and with DHCS, to the extent practicable.

### **B. Data Exchange Procedures with CSS CBOs**

KHS communicates with the CBOs via the Member Information Sharing Guidance Community Supports Authorization Status File and the CBOs share information with KHS via the Community Supports Provider Return Transmission File. Examples of data sharing activities utilized by KHS include, but are not limited to:

1. Member Assignment Files

- a. CSS CBOs will receive notifications through the provider portal for Members once they are authorized to receive a CSS benefit. KHS will share information with CSS CBOs on enrollment via SFTP file format daily.

## 2. Encounter and Claims Data

- a. Encounter data will be submitted by CBOs and facilities for payment of services rendered. This data can be submitted through multiple channels. The data provided allows payers to understand the clinical diagnoses and treatment(s) provided by health care clinicians and/or facilities.
- b. Contracted CSS CBOs are responsible for gathering, processing, and securely submitting Encounter Data for the services provided to Members. Encounter Data is the primary source of information about the delivery of services provided to Members.
- c. KHS fully retains the management of institutional encounters relating to CSS Members to include concurrent medical necessity review, care transitions, care transition notifications, and discharge planning.
- d. KHS has formal utilization management processes, clinical criteria, decision-making guidelines and support tools to ensure appropriate care is delivered. For more information regarding this process, please refer to KHS existing library of Utilization Management (UM) policies and procedures which outline in detail Member institutional and referral management activities.
- e. The KHS UM Department has established a fully operationalized comprehensive transitional care notification process for both planned and unplanned transitions to Members, Providers, inter-disciplinary care team (ICT), and hospital rendering Providers. This process will be used to support the contracted CSS CBOs to obtain timely and pertinent CSS Member medical information. KHS has existing agreements with contracted hospital partners to access the hospital EMR via the hospital's portal for KHS assigned Members.
  - i. CSS CBOs will have access to health information exchange forms to submit to local hospitals for access to CSS Members EMR.
- f. For skilled nursing facility encounters, KHS will utilize facsimile transactions containing pertinent medical record information for communication.
- g. For non-contracted institutional encounters, KHS will also use facsimile transactions to promptly provide communication and coordination to the CSS CBOs.
- h. The Member's care plan and other applicable care transition information will be included with the medical record information.
- i. Member care plan and care transition information is retrievable by hospital case

managers via the KHS and hospital portal. The information will be delivered to the Member or Member's family by the hospital case manager while the Member is in the hospital. This process will also apply to the delay of discharge information (Including any authorized services arranged for the Member). The authorization notification information will be included with the discharge instructions at the time of the Member's discharge.

- i. This information may also be mailed to the Member's home.
    - ii. If the Member is to receive home health services, the hospital will provide all pertinent hospital encounter information to the Home Health agency prior to the Home Health nurse visit.
    - iii. This information will be shared with the CSS CBO.
  - j. KHS will also provide the Member access to the KHS member portal in order for Member's to retrieve select information.
3. Sharing Member physical, behavioral, and administrative, and Social Determinants of Health (SDOH) data (e.g. HMIS data) with CSS CBO
- a. A Member profile is available to the Community Based Organization prior to the CSS member initial service. The member profile can be accessed by the Community Based Organization at any time using the KHS Provider Portal in compliance with HIPPA and other state and federal regulations. The information will include but not limited to:
    - i. Member demographics
    - ii. Qualifying medical diagnoses
    - iii. Transition plan from acute care setting
4. Reports of performance on quality measures/metrics, as requested
- a. KHS has established the Quality Management (QM) procedural process for capturing, analyzing and reporting the data to meet Centers for Medicare & Medicaid Services (CMS) specifications and requirements for these activities.
  - b. Data measurement outcomes may be shared with contracted CSS CBOs for development and implementation of quality improvement activities. KHS will also track, and report outcomes related to Health Effectiveness Data and Information Services (HEDIS) measures, encounters, enrollment, etc.
  - c. The data utilized to support these activities will come from:
    - i. Billable claims
    - ii. DHCS data transmissions to KHS for carved out services paid by other DHCS contracted entities
    - iii. Non-billable encounters that have occurred at the primary care sites and submitted to KHS as encounter data
    - iv. KHS CSS Member assessment processes
    - v. KHS PBM data

## V. ATTACHMENTS

Attachment A: Illustration of KHS Data Exchange
Attachment B:
Attachment C:
Attachment D:

## VI. REFERENCES

Reference Type	Specific Reference
Choose an item.	
Choose an item.	
Choose an item.	

## VII. REVISION HISTORY

Action	Date	Brief Description of Updates	Author
Revised	06/2025	Policy updated to comply with DHCS Community Supports Policy Guide 4/2025	Community Supports Services
Revised	08/2021	Revision 2021-08: Policy created to outline processes regarding Data Sharing. DHCS approval for Legacy Model of Care (MOC) Template Parts 1-3 received 11/30/21 to implement Community Supports Program on January 1, 2022.	

## VIII. APPROVALS

Committees   Board (if applicable)	Date Reviewed	Date Approved
Choose an item.		

Regulatory Agencies (if applicable)	Date Reviewed	Date Approved
Department of Health Care Services (DHCS)	Submitted on 6/27/25 per Jane for 2026 CSS MOC deliverable.	

<b>Chief Executive Leadership Approval *</b>		
<b>Title</b>	<b>Signature</b>	<b>Date Approved</b>
Chief Executive Officer		
Chief Medical Officer		
Chief Operating Officer		
Chief Financial Officer		
Chief Compliance and Fraud Prevention Officer		
Chief Health Equity Officer		
Chief Human Resources Officer		
Chief Information Officer		
*Signatures are kept on file for reference but will not be on the published copy		



### Policy and Procedure Review

**KHS Policy & Procedure:** 17.05-P Community Supports Data Sharing

**Last approved version:** 2021-08

**Reason for revision:** Policy updated to comply with DHCS Community Supports Policy Guide 4/2025

Director Approval		
Title	Signature	Date Approved
Adriana Salinas		

Date posted to public drive: \_\_\_\_\_

Date posted to website (“P” policies only): \_\_\_\_\_

## Attachment A

### Illustration of KHS Data Exchange

