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Mission
The Health Care Service Corporation, a Mutual Legal Reserve Company, (BCBSIL or company) Mission is “To promote the health and wellness of our members and communities through accessible, cost-effective, quality health care.”

Philosophy
The BCBSIL philosophy is to provide products and services of the highest quality and value with a direct focus on meeting the needs of customers.

The BCBSIL QI Program is based on a view that the process for delivery of medical care and services can be continuously improved. Monitoring and evaluation are an integral part of the managed care quality improvement process by revealing opportunities for positive change that can benefit both members and health care practitioners. Through the QI program, we strive to help members achieve optimal benefits by obtaining the most appropriate care in the most appropriate setting.

The 2017 QI Program focuses on areas that are important to our customers and are critical in achieving corporate goals in a manner consistent with corporate values. The program integrates fundamental management techniques, existing improvement efforts and disciplined use of technical tools for continuous process improvement. Company leadership is the driving force behind our program that creates and supports employee actions. Leadership actively participates in establishing, achieving and rewarding the completion of quality objectives.

Purpose
The purpose of the QI Program is to provide the necessary focus and structure to identify, monitor and evaluate clinical and service improvement opportunities. Through the QI Program, the Plan measures performance and progress against defined goals. The QI Program is a collaboration among physicians, providers, health care professionals, employers and plan staff who directly or indirectly influence the delivery of care and service. The QI Program supports the BCBSIL 2017 Vision.

Scope
The QI Program encompasses clinical care and services provided to members of BCBSIL plans. The scope of the quality improvement process includes a wide range of activities including process and outcomes of clinical care, behavioral health, ancillary services, pharmacy services, vendor services, member services and satisfaction, patient safety and efficient use of resources. The program is comprehensive, ongoing, and includes effective mechanisms to identify, monitor, evaluate, and resolve issues that impact the accessibility, availability, continuity, and quality of care and service provided to our members. Behavioral healthcare aspects of the QI Program are referenced in separate documents: BCBSIL Behavioral Health Quality Improvement Program Description and Magellan Behavioral Health Magellan Tristate Care Management Center Quality Improvement Program Description.

Goals
BCBSIL is committed to improving the value of health care delivery for employers, members and the communities we serve, and thus, has established the following goals:

- To promote the principles and commitment of continuous quality improvement throughout the Plan
- To measure, monitor and continually improve performance of medical care in key aspects of clinical care and service for members, physicians, providers and customers
- To implement a standardized and comprehensive quality improvement program which will address and be responsive to the health needs of the member population, inclusive of serving the culturally and linguistically diverse membership
- To develop a comprehensive, meaningful and soundly executed Quality Improvement strategy
- To demonstrate improved outcomes in medical and behavioral health care and service to members
- To monitor the QI Program for compliance with and be responsive to applicable requirements of health benefit plan sponsors, federal and state regulators and appropriate certification or accreditation entities
- To increase the knowledge/skill base of Plan staff across all functional areas
- To foster a supportive environment that assists physicians and providers to improve the quality and safety of their practice
- To focus continuous quality improvement efforts to those priority areas defined in the annual QI Work Plan which are aimed at improving member experience, satisfaction and member health and wellness
To serve members with complex health needs which can include individuals with physical or developmental disabilities, multiple chronic conditions and severe mental illnesses

**Quality Monitoring Activities**
Ongoing monitoring of specific quality indicators is an important component of the QI Program. Indicators are selected based on important aspects of care for BCBSIL members, utilizing both medical/surgical and behavioral health data. These indicators are relevant to the enrolled population, are reflective of high volume or high risk services, encompass preventive, acute and chronic care, and span a variety of delivery settings. Categories of indicators may include the following:

- HEDIS® measures
- QRS measure set
- Clinical quality improvement project data
- Service quality improvement project data
- Hospital performance indicators
- Practitioner performance indicators
- Survey data
- Utilization and Case Management quality indicators/performance measures
- Utilization data
- Member complaint and appeal data
- Access and availability data
- Credentialing/Re-credentialing data
- Membership data
- Race, ethnicity, and language data

Quality indicators are selected on the basis of their objectivity, measurability and validity. Performance goals or benchmarks may exist or be established, after baseline measurements have been completed.

**Data Collection and Reporting**
A variety of internal and external data sources may be utilized in quality indicator monitoring. In part, they include:

- Claims
- Medical records
- Surveys
- Administrative databases
- Enrollment data
- Consumer enrollment and claims databases
- Systems support databases
- Clinical documentation systems
- External data sources
- Health assessments
- Health care disparities data based on race, ethnicity and language
- Race, ethnicity, and language data
- Complaints and appeals databases
- Local and National benchmark data
- Centers for Medicare and Medicaid Services (CMS) data

**Patient Safety**
The role of BCBSIL in improving patient safety involves fostering a supportive environment to assist physicians and providers in maintaining a safe practice. The Plan’s commitment to patient safety includes but is not limited to the following:

- Distributing information to members and providers which improves knowledge regarding clinical safety as it relates to self-care
- Focusing on improving patient safety in existing quality improvement activities
- Distributing information to members, physicians and other providers which facilitates informed decisions based on safety

BCBSIL has mechanisms in place to respond timely to situations in which there may be a consumer safety risk including operational procedures for handling crisis calls.
Activities to Improve Safe Clinical Practice
BCBSIL collaborates with network physicians and providers to improve the safety of clinical care. These activities include but are not limited to:
- Conducting initiatives to improve continuity and coordination of care between physicians/providers
- Providing performance data to members and physicians/providers
- Evaluating clinical practices against aspects of practice guidelines related to patient safety
- Investigating quality of care issues
- Utilization Management (UM) data to promote patient safety

Adverse Event/Ongoing Monitoring:
In addition to fostering an environment which promotes safe clinical care through the establishment of performance standards and expectations and conducting systematic compliance monitoring, BCBSIL is also responsible for the identification and evaluation of individual instances of potential quality of care concerns. The concerns are identified by a variety of functional units within BCBSIL. The Plan is responsible for initiating the investigation and evaluation of the facts surrounding the event, as well as the facilitation of peer review and follow-up actions by the appropriate committee or individual. Examples of situations which may be considered for review include, but are not limited to:
- Potential quality of care issues
- Physician or provider concerns about previous medical management
- Evidence of inappropriate medical care identified during case review for medical management programs, or other clinical review
- Questionable conduct on the part of a physician or provider
- Practitioner office site quality

The investigation of an issue focuses on the identification of the potential cause of the adverse event, such as over or under-utilization of services, practicing in a manner inconsistent with current medical knowledge, breakdown in continuity or coordination of care, lack of access or availability of services, etc.

BCBSIL will also investigate and take action on concerns raised by members or by internal review related to potential quality of care issues on a case-by-case basis. Quality review of individual cases may result in interventions depending on severity, including termination from the network, reporting to State licensing agencies, the National Practitioner Data Bank (NPDB) and Healthcare Integrity and Protection Data Bank (HIPDB).

Pharmacy Programs
BCBSIL’s Pharmacy Benefit Manager (PBM), Prime Therapeutics, offers the concurrent drug utilization review (DUR) program which screens prescriptions at the point of sale for potential drug problems such as drug to drug interactions. If a DUR edit flags a claim in the claims system, a message is displayed online for the pharmacist to identify the potential conflict before the member receives the medication. Prime complies with the National Council for Prescription Drug Programs (NCPDP) specifications for online DUR.

Prime also works with BCBSIL to identify and notify members and practitioners likely affected by product recalls or voluntary drug withdrawals. Letters to practitioners include a listing of their patients who have a prescription on record for the affected drug.

Ongoing retrospective drug utilization review (RDUR) programs target physicians about a different medication management issue quarterly. The controlled substance RDUR program is designed to identify members whose utilization of controlled substances appears to be excessive based on a combination of measured parameters that results in a “usage score” in order to reduce the incidence of controlled substance misuse/abuse. BCBSIL sends letters to the prescribing physician with a prescription profile for each of the physician’s identified patients who appear to have established patterns of controlled substance misuse.

BCBSIL’s medication adherence programs identify members whose prescription fill history suggests possible non-adherence. At risk members are identified using diagnosis codes where medication adherence is critical to the disease management plan. Prescribers and/or members receive communication if non-adherence is identified in the following therapeutic areas:
- Antiviral
- Asthma
- Chronic Obstructive Pulmonary Disease (COPD)
- Cholesterol, Depression, Diabetes
- Hypertension
- Schizophrenia
BCBSIL Quality Improvement Committee

The BCBSIL Quality Improvement Committee (QI Committee) is responsible for providing oversight and direction to the Quality Improvement Program. The QI Committee is chaired by the BCBSIL Vice President and Chief Medical Officer or physician designee. The QI Committee brings multidivisional staff together with employers, providers and members for the purpose of reflecting customer values. A BCBSIL Medical Director is responsible for ensuring the Governance and Nominating Committee receives the reports from the QI Committee.

Responsibilities of the QI Committee include:
- Review and approval of the annual BCBSIL Quality Improvement Program including the Illinois Appendix
- Review and approval of the annual BCBSIL Quality Improvement Work Plan
- Review and approval of the preventive care and clinical practice guidelines
- Monitoring and analysis of reports on QI activities from subcommittees
- Oversight of delegated activities
- Review and approval of annual BCBSIL Quality Improvement Program Evaluations
- Review and approval of Medical Management Quality Improvement Projects
- Review and approval of summary reports from the Policy and Procedure Committee
- Review and approval of summary reports from the Enterprise Medical Management Policy and Procedure Committee
- Recommendation of policy decisions
- Analysis and evaluation of the results of quality improvement activities
- Review of analysis of significant health care disparities in clinical areas
- Review of analysis of information, training and tools to staff and practitioners to support culturally competent communication
- Review of analysis of onsite audit results
- Review of analysis and evaluation of member complaints
- Review and analysis of member and provider appeals
- Review of analysis and evaluation of populations with complex health needs
- Ensuring practitioner participation in the QI program through project planning, design, implementation and/or review
- Institution of needed actions
- Ensuring follow-up, as appropriate
- Maintain signed and dated meeting minutes

Network Practitioner Selection and Provider Selection and Monitoring

Practitioner Credentialing and Re-credentialing

BCBSIL has implemented criteria for the selection and retention of network practitioners and providers. All contracted practitioners and providers must meet the applicable selection criteria.

The credentialing/re-credentialing process is designed to assess physician and provider compliance with BCBSIL participation criteria and the ability to deliver care and service to members. Physicians are re-credentialed at least once every three years thereafter, or more frequently as determined by the Credentialing Committees. The scope of individual physicians credentialed and re-credentialed includes MDs, DOs, DPMs, DDSs, and contracted independent practitioners, such as nurse practitioners, chiropractors, physical therapists, mental health professionals, and essential community providers, as appropriate.

The physician and health care professional/practitioner credentialing/re-credentialing process includes primary source verification consistent with NCQA and URAC standards, states and federal regulatory requirements, as well as CMS and BCBSIL requirements.

BCBSIL monitors information from licensing agencies and updates from the National Practitioner Data Bank (NPDB) regarding sanctions and restrictions on licensure or scope of practice according to schedules dictated by the individual agencies. Additionally, the Debarment Screening Tool is reviewed to identify individuals and/or parties that have been sanctioned or debarred by any of the following six government listings:
- The Office of Foreign Asset Control Specially Designated Nationals (OFC)
- The Office of Foreign Asset Control Sanctioned Countries (OSC)
- The Office of the Inspector General (OIG)
• System for Award Management (SAM) Excluded Parties List System (EPL); Note: All exclusion records from GSA’s Excluded Parties List System, including Office of Personnel Management (OPM) were moved to SAM EPL on November 21, 2012.
• The Foreign Evaders Sanction List (FSE)
• The Illinois Department of Public Aid- IL Medicaid Program (ILSEL)
• The Texas Health and Human Services Commission- TX Medicaid Program (TXSEL)

When participating physicians and providers are identified through any of the above queries, the physicians and providers are brought forth for disciplinary action up to and including termination.

**Member’s Rights and Responsibilities**

In accordance with federal and state regulatory requirements, and accreditation needs, BCBSIL is committed to ensuring our member’s rights and responsibilities are respected, upheld, and available in various communication mediums to the member and participating providers.

The purpose is to:

- To build up member confidence in the health care system, by making it easy for members to be involved in their own health care.
- To strongly support the importance of a good healthcare provider and that of a good provider-patient relationship.
- To emphasize and support the importance of the members’ role in making sure they have rights and responsibilities with regard to health improvement.

BCBSIL is committed to the cultural, linguistic and ethnic needs of our members; thus communication tools are available to support the diverse membership. BCBSIL has written policies that state its commitment to treating members in a manner that respects their rights, and its expectations of members’ responsibilities. The policies encompass the following: Information Disclosure, Choice of Providers and Plans, Access to Emergency Services, Participation in Treatment Decisions, Respect and Non-Discrimination, Confidentiality of Health Information, and Complaints and Appeals.

BCBSIL also holds forth certain expectations of members with respect to their relationship to the Plan and their individual health care practitioners. These rights and responsibilities are reinforced in member and provider communications, including the BCBSIL Web site.

Components of the QI Program incorporating elements of member rights may include:

- Policies on inquiries and complaints
- Policies on appeals
- Policies on quality of care complaints
- Access standards
- Member involvement in satisfaction surveys

In addition, the policy on Member Rights and Responsibilities further defines the relationship between the member, the practitioner and BCBSIL.

Distribution methods of the member rights and responsibilities statement include, in writing by mail, fax or email. The Plan is responsible for insuring mechanism is in place for existing members and practitioners to receive this information and any revisions as they occur.

**Member Education**

BCBSIL features information in member publications and on the BCBSIL Plan Web sites to improve member knowledge about methods by which members may reduce the likelihood of errors in their care. An example is EMMI Solutions, online health education videos. EMMI programs provide practical information in an easy to understand format in order to empower members to manage their care more effectively and participate in treatment decisions. EMMI Solutions allows clinical staff to “prescribe” videos to members participating in care management programs. Members receive an email with a link to a video tutorial relevant to their care plan. These modules support more informed decisions and help members understand symptoms, treatments, side effects and risks. Members can pause to take notes and the system generates a document to discuss with their physician.

In addition, BCBSIL has an online community called “Connect” where members can find content related to various diseases and prevention categories. This includes blog articles, videos, and links to authoritative sources of information (e.g. associations). Connect readers can comment on posts and share content with others via social media channels including Facebook, Twitter, and LinkedIn. For retail and on exchange small group members,
new specific pages for Diabetes, Coronary Artery Disease, Colorectal Cancer Screening, and Flu Shot were created to select appropriate content for the Connect sites and EMMI video content related to those topics for our members. Members are directed to the pages via email and direct mail.

Member Experience

The monitoring, evaluation and improvement of member experience are important components of the QI Program. This is accomplished through the use of surveys, as well as through the aggregation, trending and analysis of member complaint and appeal data, including the following categories: quality of care, access, attitude and service, billing and financial issues and quality of practitioner office site. In addition to the administration of surveys, BCBSIL encourages members to offer suggestions and express concerns utilizing customer service telephone lines and request for comments in survey instruments.

The following surveys are utilized in the assessment of member experience:
- Continuous Tracking Program (CTP): population based member satisfaction survey which is administered on an ongoing basis to a sample drawn from the entire enrolled population.
- Case Management Survey, if applicable
- Behavioral Health Member Satisfaction Survey, if applicable
- Condition Management Survey, if applicable
- Special Beginnings Survey, if applicable
- Consumer Assessment of Healthcare Provider and Systems (CAHPS®), if applicable
- Qualified Health Plan Enrollee Experience Survey (EES), if applicable
- Customer Service Post-Interaction survey, if applicable

BCBSIL may also solicit input from members, employers, providers, and facilities by the following means:
- Ad-hoc advisory groups
- Face-to-face meetings
- Telephonic encounters

HEDIS®

For selected products, Healthcare Effectiveness Data & Information Set (HEDIS®) Performance Measures results are evaluated on an annual basis to monitor improvement. HEDIS® data are collected from claims, encounters, and may be supplemented with medical chart review. HEDIS® data submitted to National Committee for Quality Assurance (NCQA), the Blue Cross and Blue Shield Association (BCBSA) and other entities, are audited by an NCQA certifie® auditor.

Quality Rating System (QRS) Measure Set

As part of the Affordable Care Act (ACA) requirements, Centers for Medicare and Medicaid Services (CMS) developed the Quality Rating System (QRS) to:
- Inform consumer selection of Qualified Health Plans (QHPs) offered through a Health Insurance Marketplace (Marketplace)
- Facilitate regulatory oversight of QHPs
- Provide actionable information to QHPs for performance improvement

QHP and Multi-State Plan (MSP) issuers that offer coverage through a Health Insurance Marketplace are required to submit third-party validated QRS clinical measure data and QHP Enrollee Survey response data to CMS as a condition of certification.

Qualified Health Plans (QHP) Quality Improvement Strategy (QIS)

As an issuer participating in a Marketplace, BCBSIL will implement and report on at least one Quality Improvement Strategy (QIS) in accordance with section 1311(g) of the Affordable Care Act. The QIS will cover each state in which the Plan has participated in the Marketplace for two or more consecutive years and enrollment was >500 enrollees within a product type by State during the designated time period.

BCBSIL will review data to identify the appropriate QIS for each Marketplace that includes at least one of the following:
- Activities for improving health outcomes;
- Activities to prevent hospital readmissions;
- Activities to improve patient safety and reduce medical errors;
- Activities for wellness and health promotion; and/or
Activities to reduce health and health care disparities. BCBSIL will also explore ways to address health and health care disparities.

BCBSIL will use market-based incentives to improve the quality and value of health care and services specifically for Marketplace enrollees. All QIS activities will be linked to an incentive as defined by CMS. The market-based incentive types to be included are: 1) increased reimbursement or 2) other incentive. The incentive will be a provider market-based incentive, an enrollee market-based incentive, or both.

Each year, the status of each QIS will be determined based on the following:

- Continue the QIS without modification
- Continue the QIS with some modifications
- Discontinuing the QIS

If a decision is made to discontinue a QIS submitted during a prior period, a new QIS will be selected for the applicable Marketplace.

Continuity and Coordination of Care
Continuity and coordination of care are important elements of care and as such are monitored through the QI Program. Each Plan identifies opportunities for improvement in the continuity and coordination of medical care. Initiatives are selected across the delivery system, including settings, transitions in care and patient safety. In addition, coordination between medical and behavioral health care is also monitored.

Practice Guidelines
BCBSIL has developed and implemented both clinical practice and preventive care guidelines. The guidelines are developed and derived based upon a variety of sources, including recommendations from specialty and professional societies, consensus panels and national task forces and agencies; review of medical literature and recommendations from ad hoc committees. Clinical practice and preventive care guidelines are updated at least every 2 years or more frequently, as needed. Preventive care guidelines include age and gender-specific and perinatal evidence-based recommendations. Clinical practice guidelines such as Asthma, COPD, and Diabetes include evidence-based recommendations.

Service Quality Improvement
The services provided by the Plans support members and the health care delivery system. Further, satisfaction with BCBSIL is often derived from the quality of service the members receive. Service standards have been established to prevent issues, whenever possible, and provide consistent, timely and accurate information and assistance to members, physicians, providers and other customers. The standards are routinely monitored and reported to the appropriate committees. Surveys and complaints are monitored to ensure the standards established are appropriate and meet the needs of the organization and customers.

Care Management Programs
BCBSIL has active programs for the development, implementation, and assessment of care management programs that coordinate care for members with chronic conditions and risk factors. Blue Care Connection® transitions the current medical management continuum to an integrated, member-centric approach. The Program is designed to pro-actively identify and “reach-out” to select BCBSIL members based on individual market or employer group specific utilization, case and condition management parameters.

Blue Care Connection® combines the traditional elements of medical care management with health advocacy components to create a management strategy that is sensitive to the care needs of the individual member. The care management strategies include:

Condition Management Programs are an integral part of the BCC program, which focus on a series of intensive interventions to alter the normal course of a specific chronic disease. The approach to condition management is characterized by three steps:

1) Identification and stratification: Identification of members with specific chronic illness occurs through concurrent review of inpatient cases, physician referrals and analysis of medical claims, face to face encounters, pharmacy, laboratory data, predictive modeling data, health assessments (HAs), as well as real time referrals.
2) Institution of a condition management intervention based upon severity: The interventions vary from program to program because they are condition specific, but in general they emphasize clinically-based education and counseling based on nationally recognized clinical practice guidelines. Motivational interviewing techniques are utilized with members to undertake and maintain behavior change.

3) Evaluation of the effectiveness of the program: Relevant outcomes include analysis of changes in hospitalization rates and emergency encounters, closure of clinical gaps in care, member satisfaction with the program, quality of life or functional status, and cost savings.

Health Promotion and Education Activities which focus on the provision of information and tools to members in order to increase knowledge and the ability to self-manage their care.

Lifestyle Management Programs are a component of BCC designed to assist members in making a change in their behavior to reduce negative medical consequences resulting from lifestyle choices and to increase their overall quality of life. The Lifestyle Management program is administered by health coaches who are licensed professional counselors, licensed masters/clinical social workers, registered dieticians, certified exercise specialists and case managers with expertise in behavioral modification, weight management and tobacco cessation. Co-management and integration with other components of BCC including Condition Management and Special Beginnings® ensures a holistic approach to maximize member’s health and productivity.

Case Management facilitates access to care for members requiring complex coordination or resources, especially when the required care is not available in the member’s service area. As part of complex case management, high cost claimants, patient alerts (i.e., ER visits and Transportation) are high priority for intervention. Rare disease management is offered to members who have select complex chronic diseases determined to be potentially high cost, but rare within the member population. The goal of the program is to improve clinical, utilization and patient satisfaction outcomes.

Care Coordination and Early Intervention (CCEI) focuses on quality related to care coordination including pre-admit/post discharge outreach, education related to patient safety/medication compliance, discharge planning, and episodic case management for all products. Member outreach/engagement occurs in both the inpatient and outpatient setting with a focus on preventing hospital readmissions and non-trauma ER visits.

The Special Beginnings® Program assists members in obtaining access to appropriate prenatal care. Pregnant members of select Employer Groups are eligible for the program, which includes the identification of a potential high-risk pregnancy and screening for a potential for depression. Case management is provided for any member identified as high-risk and includes ongoing coordination of care by case managers with expertise in obstetric case management. The program identifies and utilizes facilities appropriate for high-risk deliveries and neonatal emergencies.

Behavioral Health – BCBSIL’s Behavioral Health Care Management (BHCM) Program is designed as an Integrated Service Delivery Model. Integration of behavioral health with medical care management supports continuity and coordination of care between medical and behavioral health physicians and professional providers. The model effectively integrates health care management programs that optimize member/provider access, facilitates navigation of benefits/services, and enhance information sharing/exchange to identify and close gaps in care. Members requiring co-management of behavioral health and medical conditions will be identified early on, resulting in coordination of care, clinical efficiency, improved outcomes and reduced costs over time.

Blended Model Care Management Program - Programs may include Behavioral Health (BH) and Complex Case Management Programs. All Care Management Programs are developed based on Clinical Practice Guidelines. The Clinical Practice Guidelines are derived from a variety of sources, including recommendations from specialty and professional societies, consensus panels, national task forces, federal agencies, review of medical literature and/or recommendations from ad hoc committees. Blended Model Care Management includes assessment, plan of care, setting measurable goals, and performing an objective evaluation upon discharge from the program. Measurable goals may include improvement in clinical quality of care, patient experience, and member satisfaction with plan benefits.
Technology Assessment and Medical Policy Reviews

BCBSIL has a unified process for development, review and update of Medical Policies. These Medical Policies are used by the Blue Cross and Blue Shield Plans that are Divisions of BCBSIL.

A medical director from each BCBSIL Plan is assigned primary responsibility for the BCBSIL Medical Policy process. An BCBSIL Behavioral Health Practitioner is included in the review process for policies involving behavioral health. The medical directors and the Behavioral Health practitioner, if applicable, work collaboratively to review and discuss both new and established policies, then reach a consensus on coverage recommendations for each Medical Policy.

Review of Medical Policy is an ongoing process. New technology is evaluated on a regular basis to determine the appropriateness of benefit coverage for advances in medical procedures, drugs and devices. Medical Policies include a review of the scientific knowledge for the technology, product, device, procedure or drug currently available in the English language.

Resources for technology assessment and medical policy review may include, but are not limited to:

- BCBSA Technology Evaluation Center (TEC) Assessments
- Reporting on new and established technology in scientific and medical peer reviewed journals (preferably randomized controlled trials)
- Statements on medical practice standards from professional organizations
- Medicare coverage policy
- Suggestions from participating physicians and other providers
- Issues arising from unique claims or appeals trends
- Publicly available medical policies from other health plans

Draft medical policies are submitted electronically to BCBSIL Medical Directors and, along with claims data when applicable, to an internal review committee comprised of departments within BCBSIL that may be impacted by the medical policy. Drafts are also posted in a dedicated area of the Provider page of the Internet Web site that allows direct comment from external physicians, other practitioners and other stakeholders.

Delegation

The Plan may elect to delegate/ authorize another entity to carry out functions that would otherwise be performed by the Plan. The Plan is responsible for delegate oversight and retains ultimate accountability for all delegated functions. Established criteria are in place to assess the ability of each potential delegate to perform required functions prior to entering into a delegation contract. Current delegates are subject to the same established criteria and are continuously monitored for compliance via standardized report submissions, annual audits and monitoring plan. All delegates must comply with the requirements as indicated by the Plan, the delegation agreement, accreditation standards (i.e., URAC, NCQA), ERISA/DOL, HIPAA, and, State and Federal regulations.

External Accountability

The BCBSIL QI Program is designed to meet all applicable state and federal requirements (e.g., HIPAA etc.). Plan staff, in cooperation with the BCBSIL Compliance and Legal Departments, monitors state and federal laws and regulations related to quality improvement and reviews program activities to assure compliance. In addition, if the Plan achieves external accreditation/certification, maintenance of such accreditation/certification is monitored through the QI program.
Accreditation Matrix
The BCBSIL Quality Improvement Program is designed to meet all applicable state and federal requirements (e.g. HIPAA etc.). Plan staff, in cooperation with the BCBSIL Compliance and Legal Departments, monitors state and federal laws and regulations related to quality improvement and reviews program activities to assure compliance. In addition, if the Plan achieves external accreditation/certification, maintenance of such accreditation/certification is monitored through the QI program.

BCBSIL maintains accreditation for the products identified from the listed accrediting bodies:

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<th>Product</th>
<th>NCQA</th>
<th>URAC UM</th>
<th>URAC CM</th>
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Quality Improvement Program Documents

QI Program Description
The BCBSIL QI Program Description is reviewed annually and is updated as needed. On an annual basis, the document is presented to the Governance and Nominating Committee for review and approval.

QI Work Plan
The BCBSIL Quality Improvement Program Work Plan is initiated annually based upon the planned activities for the year and includes improvement plans for issues identified through the evaluation of the previous year’s program. The scope of the BCBSIL Work Plan must include all aspects of the QI Program and the activities must be appropriately linked to the established goals and objectives. The Work Plan will include a delineation of responsibility and specific time frames for accomplishing each planned activity. The BCBSIL QI Work Plan is reviewed and approved by the Plan QI Committees. On an annual basis, the document is presented to the Governance and Nominating Committee for review and approval.

The document may be updated throughout the year to reflect the progress on QI activities and new initiatives as they are identified.

QI Program Evaluation
On an annual basis, there is a written evaluation of the BCBSIL QI Program. The evaluation includes an assessment of progress made in meeting identified QI initiatives and goals and an evaluation of the overall effectiveness of the Quality Improvement Program.

The Quality Improvement Program is then updated accordingly. On an annual basis, the document is reviewed and approved by the Plan QI Committees. The document is then presented to the Governance and Nominating Committee for review and approval.

Disclosure of the QI Program Information
Information regarding the QI Program is made available to BCBSIL participating physicians and other providers and to enrollees, upon request.

Quality Improvement Program Approval
Annual approval of the 2017 BCBSIL Quality Improvement Program Description will be demonstrated by resolution. Appendices are available for each Plan within BCBSIL that address state-specific requirements.