Processing Policy for the SWICA Data Receiving Unit

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1   Purpose, scope

1.1   Purpose

Pursuant to Art. 32 of the Federal Health Insurance Act (KVG), benefits must be purposeful and cost-effective. The insurance companies are obligated to ensure that this is the case (Art. 56 KVG).

In this connection, the Federal Council determined in Art. 59a paras. 3 and 4 of the Health Insurance Ordinance (KVV) that service providers must, pursuant to Art. 59 para. 1 KVV (Minimal Clinical Dataset MCD), forward any datasets with administrative and medical information to the insurance company's Data Receiving Unit at the same time as the invoice. The Data Receiving Unit determines which invoices require an additional review and then forward the necessary information to the insurer. The insurer is not permitted to issue directives to the Data Receiving Unit about passing on data that pertains to individual invoices.

These Processing Regulations define how the statutory requirements are to be implemented at SWICA.

1.2   Scope

These Regulations are valid for Data Receiving Units of those companies of SWICA Healthcare Organisation (SWICA Group, hereinafter referred to as "SWICA") that are subject to the KVG and that accept DRG-type invoices:

- SWICA Healthcare Insurance Ltd
- PROVITA Gesundheitsversicherung AG

The process for accepting DRG-type data is identical for all the listed companies, and such data is managed under the name "SWICA Healthcare Organisation". Centris Ltd (hereinafter "Centris") acts as the IT provider and is part of SWICA's Data Receiving Unit.

These Processing Regulations are valid for processes up to Inspection Stage I in accordance with para. 6.2.

Additional documents to these Regulations are:

- Process definition of DRG (process and data processing at system level)
- Philosophy paper medical coding DRG/TarPsy (process and instructions)
- Work instruction AVOR (paper process for DRG invoices)
- Work instruction for physical mail (paper process for MCDs from DRG)
- Authorisation process for SwissDRG with MCD access
- SWICA's data protection policy

2   Scope of the Data Receiving Unit

SWICA's Data Receiving Unit accepts and forwards DRG-type invoices that arrive as hard copies or in electronic form.
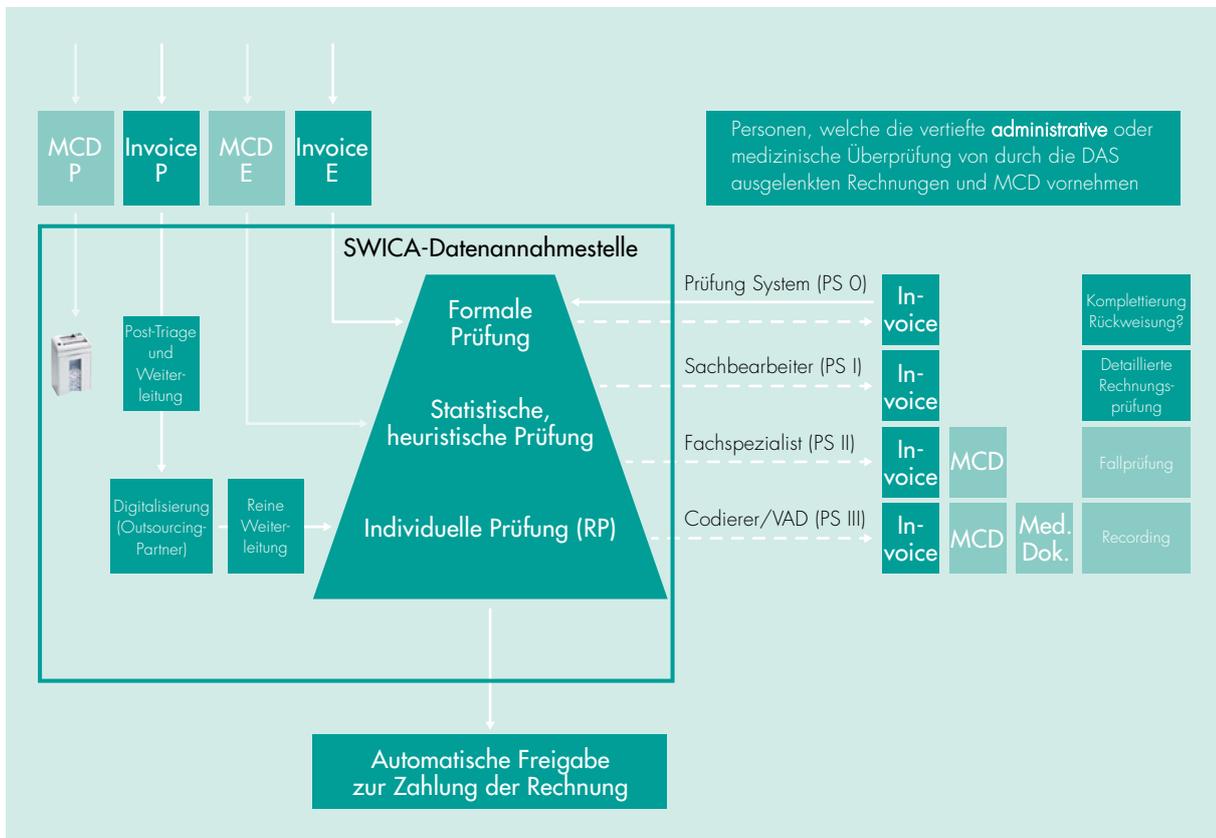
The following section describes the electronic process and the paper process.

3 Electronic process

Centris accepts the DRG-type invoices on behalf of SWICA. The receipts are checked, and any rejected ones are made available to SWICA employees for further analysis. Receipts that are not rejected or that have been released are generated into invoices, which are then paid once the benefits have been reviewed by means of an automated process.

3.1 MCD check/check of medical data

Automated check of electronic MCD involves several phases:

- Formal check
- Statistical, heuristic check
- Individual check to determine if cover is in effect

These checks are carried out by means of background processing (automated, electronic).

Only those invoices that the system recognises as anomalous are rejected and forwarded to a specialist or medical staff member (DRG specialist, coding specialist) for a detailed review.

The MCD check (with medical data) is carried out by persons with the relevant authorisations. Their opinion is communicated to the administrator, who then makes the decision on whether to release the invoice for payment or to return it to the service provider. The MCD thus remains in the Sumex II System and is not shared with the core system nor with the service provider.

4 Inspection of medical data/interfaces

4.1 Centris

At Centris, system administrators have access to all data. The insurance companies are notified periodically about the persons who have access. Authorisations are issued based on the authorisation concept.

4.2 Technical connection to Centris

The computers of SWICA employees use secure connections when communicating with the applications at Centris. SWICA uses separate and especially protected transmission lines so that data does not need to be transmitted over the internet.

4.3 Insurance/MEO

The submitted invoices and MCDs are made available to SWICA employees in predefined mailboxes. Access to the invoices and MCDs is defined also by means of an authorisation concept. This ensures that the administrators in the insurance unit have access only to the invoices and that only the medical examiner's office (MEO) or their explicitly appointed assistants have access to the MCD.

4.4 Interfaces

The service provider delivers the medical data to the certified Data Receiving Unit. There is no need to share the data with another system for processing and inspection purposes.

Any data that is passed on to a coding system is anonymised.

5 Paper process

DRG invoices that SWICA receives as hard copies are processed in accordance with the "Work instruction AVOR" process.

Employees of the internal postal unit handle the distribution of physical mail (rough sorting). All DRG-type benefit invoices are forwarded to the benefit unit's mailroom, which then sorts it by addressee. DRG-type invoices are first sorted and then prepared and forwarded to Tessi (Tessi document solutions, Switzerland, GmbH) for scanning (digitalisation) purposes.

Once digitalised, the invoices are sent electronically to the invoice review unit, where they are processed in the same way as electronically received invoices.

MCDs from a DRG that reach SWICA in hard-copy form are subsequently shredded, in compliance with data protection provisions. For this, the staff of the internal postal unit must follow the steps of the "Work instruction post-triage" process.

6 Responsible persons/units

6.1 Involved units

6.1.1 User administration

SWICA is responsible for user administration.

Under the concept laid out in the "Authorisation process for SwissDRG with MCD access", authorised employees are registered with a central unit where SWICA-approved employees subsequently check and release the access authorisations as needed.

6.1.2 Users

The right to inspect medical information is granted to users who need such data in order to carry out their tasks:

- Specialists from DRGs
- Coding experts
- Staff of SWICA's Medical Examiner's Office (MEO)
- System administrators at Centris

6.2   Organisation

DRG invoices (incl. MCDs) are processed in accordance with a four-step process:

Stage 0	Stage I	Stage II	Stage III
XML-Empfang oder Posteingang/Triage/ Umwandlung Automatische Prüfung:	Sachbearbeiter Leistungen:	Einzelfallprüfung FS DRG:	Einzelfallprüfung durch Codierer:
– Statistische Prüfung (DRG-Box) – Medizinische Prüfung (IRP) – Formale Prüfung	– Versicherungstechnische Prüfung	– Prüfung DRG mittels MCD – Einforderung codierrelevante Unterlagen – Leistungspflicht-Prüfung – Überprüfung Zusatzentgelt – Leistungsfreigabe	– Prüfung mittels MCD und codierrelevanten Unterlagen – Vollständigkeitsprüfung Unterlagen – Nachcodierung mit DRG-Expert

Inspection **stage 0** comprises the formal check in the system; this is a purely technical check.

Inspection **stage I** processes the electronically rejected invoice and checks all rejected Sumex codes. If an invoice is marked with Sumex code Q18 "MCD is anomalous", the invoice is forwarded to inspection **stage II** by setting the invoice to status "MCD validation".

Inspection **stage II** (DRG specialist) checks the DRG invoice, checks any Sumex codes that are still unresolved and the correctness of the invoice in line with the SwissDRG accounting rules. They also check the MCD and the rejections listed there. Codes appear on the MCD that set Q18 on the invoice. Inspection **stage II** uses the MCD anomalies and other reasons for rejection to coordinate measures leading to case processing and case closure. Inspection **stage II** is responsible for managing pending invoices in the workflow and for releasing MCD-anomalous invoices. If further investigations are to be undertaken, inspection **stage II** assumes responsibility for coordinating the interfaces.

Inspection **stage III** (medical coders) checks the correctness of the DRG invoice on the basis of the MCD and other medical documents. They check whether the selected diagnosis and procedure codes are correct based on the coding manual and additional guidelines of the Federal Statistical Office.

Overview of inspection stages at Head Office and in the Regional Head Offices:

External organisation		Inspection Stage I (automated)	Inspection Stage II (specialists DRG)	Inspection Stage III (coders)
	MCD visible	No	Yes	Yes
Head Office (Winterthur)		×		×
Regional Agency Bellinzona		×	×	
Regional Agency Berne		×	×	
Regional Agency Lucerne		×	×	
Regional Agency Basel		×	×	
Regional Agency Lausanne		×	×	
Regional Agency St. Gallen		×	×	×
Regional Agency Winterthur		×	×	
Regional Agency Zurich		×	×	

The roles are administered actively in accordance with the "Authorisation process for SwissDRG with MCD access". All employees with an active role in the DRG process are known by name.

The four-stage DRG invoice checking process, the data processing stage, and the specialist instructions are laid out in detail in the following documents:

- Process definition of DRG (process and data processing at system level)
- Philosophy paper medical coding DRG/TarPsy (process and instructions)

7 Obligations of specialists

All specialists who are tasked with inspecting personal medical data are subject to non-disclosure and secrecy obligations. In order to take into account the special importance of data sensitivity when processing MCD invoices, employees must sign a corresponding declaration.

8 Quality assurance

A two-part management process, which is part of the internal control system (ICS), applies so as to ensure that the quality of the DRG process at SWICA continues to develop.

The specialised process, which is designed to monitor compliance with data protection provisions and enable efficient and effective checking of invoices, uses predefined criteria, and possibly other benchmarks that are to be developed further, in order to ensure the effectiveness of the DRG review process. These benchmarks are entered monthly in the cockpit. Each quarter, a report on the cockpit is produced for the attention of the department head of benefits for private customers, the head of benefits, and the operational data protection officer.

Once a year, the "DAS-Management-Review" is produced as a consolidated report, which, as part of SWICA's quality management report, is intended for SWICA's Executive Committee and the Compliance Management unit.

The Operational Data Protection Officer is involved directly in defining the benchmarks that apply to data protection. Whenever separate rules for rejecting items are issued, they must be submitted to the Operational Data Protection Officer for approval before they are forwarded to Centris for implementation.

The Operational Data Protection Officer, who is not subject to the directive on data protection, must review annually the currency and efficacy of the data protection management system, including the Data Receiving Unit. He must report his findings in accordance with the SWICA Corporate Governance Concept for the attention of the Executive Committee and the Governance Management unit.

The Operational Data Protection Officer must ensure that his knowledge is up to date and that employees working in the field of data protection receive regular training and instruction.

9 Entry into force

This directive enters into force on 20/05/2019 and replaces the directive on "Processing Regulations for the Data Receiving Unit (DRU) of SWICA"(W-3210) of 15/04/2016.

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