

## De –Empanelment Guidelines

### De-Empanelment Procedure

Hospitals empanelled under the UHC Scheme “ Arogya Karnataka” can be de-empanelled if they fail to meet and uphold the necessary criteria agreed upon. De-empanelment will be on the recommendations of the Empanelment and Disciplinary Committee formed for the purpose. The following steps are to be followed for de-empanelment of hospitals.

#### **1.1. “Watch-List” Status**

Based on the claims data analysis or hospital visits by the Vigilance Officer of SAST or any authorized inspection authority, or any complaint received about the hospital from the patient or any third party interested person or any complaint received /reported in the grievance cell the EDC or its representative can put that hospital in the watch list and serve a show cause notice for the observed deviations. The data of such hospital shall be analyzed very closely on a daily basis by SAST or its representatives for patterns, trends and anomalies.

#### **1.2. Suspension:**

A hospital can be temporarily suspended in the following cases:

- a) For the hospitals which are in the “Watch-List” if continuous patterns or strong evidence of irregularity based on either claims data or field visit of hospitals is observed, the hospital shall be suspended from providing services to UHC scheme patients and a formal investigation shall be instituted.
- b) If a hospital is not in the “Watch-list”, but it is observed at any stage that it has data/ evidence that suggests that the hospital is involved in any unethical practice/ is not adhering to the major clauses of the contract under UHC scheme, or their representatives/ involved in financial fraud related to UHC Scheme patients, it may immediately suspend the hospital from providing services under UHC scheme and a formal investigation shall be instituted.
- c) All admitted patients under the “Arogya Karnataka” scheme will be provided continued treatment and no fresh admission can be done by the Hospital.
- d) To ensure that suspension of the hospital results in their not being able to treat UHC patients, a provision has been made in the software so that Hospital cannot send electronic claims data to UHC scheme portal.
- e) A formal letter shall be sent to the hospital regarding its suspension with mentioning the timeframe within which the formal investigation will be completed.

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### **1.3. Detailed investigation**

There shall be a detailed investigation into the activities of a hospital in the following conditions:

- a) For the Hospitals which have been suspended.
- b) Receipt of complaint of a serious nature from any of the stakeholders.
- c) The detailed investigation may include field visits to the hospitals, examination of case papers, talking with the beneficiaries (if needed), examination of hospital records etc.
- d) If the investigation reveals that the report/ complaint/ allegation against the hospital is not substantiated, suspension will be immediately revoked (in case it is suspended) the same will be informed to the concerned Hospital, district hospital and the process to receive claim from the hospital will be restarted.

### **1.4. Operative Action**

If the investigation reveals that the complaint/allegation against the hospital is correct then following procedure shall be followed:

### **1.5. Deviations from MoU are classified as follows**

#### *1. Medical Deviation (Example)*

- Denial of admission /treatment.
- Service unavailability
- Non delivery of commitment

#### *2. Financial Deviation (Example)*

- Co-payment
- Not giving conveyance charges/post discharge medicines /ambulance in case of death
- Outside prescription or investigations.
- Cancellation of approvals and converting scheme patients to cash

#### *3. Denial of services (Examples)*

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- Follow up care denial.
- Denial of treatment of post-operative complications.
- Excessive delays

### 4. *Other deviations (Example)*

- Discrimination of the scheme patient in allotting dates for procedures or standard of care
- Injustice concerns (such as Overage, caste, sex, religion etc. )
- Staff misbehaviour

### **1.6. Procedure to be followed in case of reporting of deviation by a hospital (Fig. 2)**

a) The Hospital will be issued a notice seeking an explanation for the deviation.

b) After receipt of the explanation and its examination, the case would be placed in the empanelment and disciplinary committee meeting for further action. The charges may be dropped or action can be taken based on the explanation and findings for which the committee is empowered to institute a fact-finding enquiry against the hospital.

c) The action could entail one of the following based on the seriousness of the issue and other factors involved:

i) A warning to the concerned Hospital and financial penalty as prescribed from time to time.

ii) De- empanelment of the Hospital.

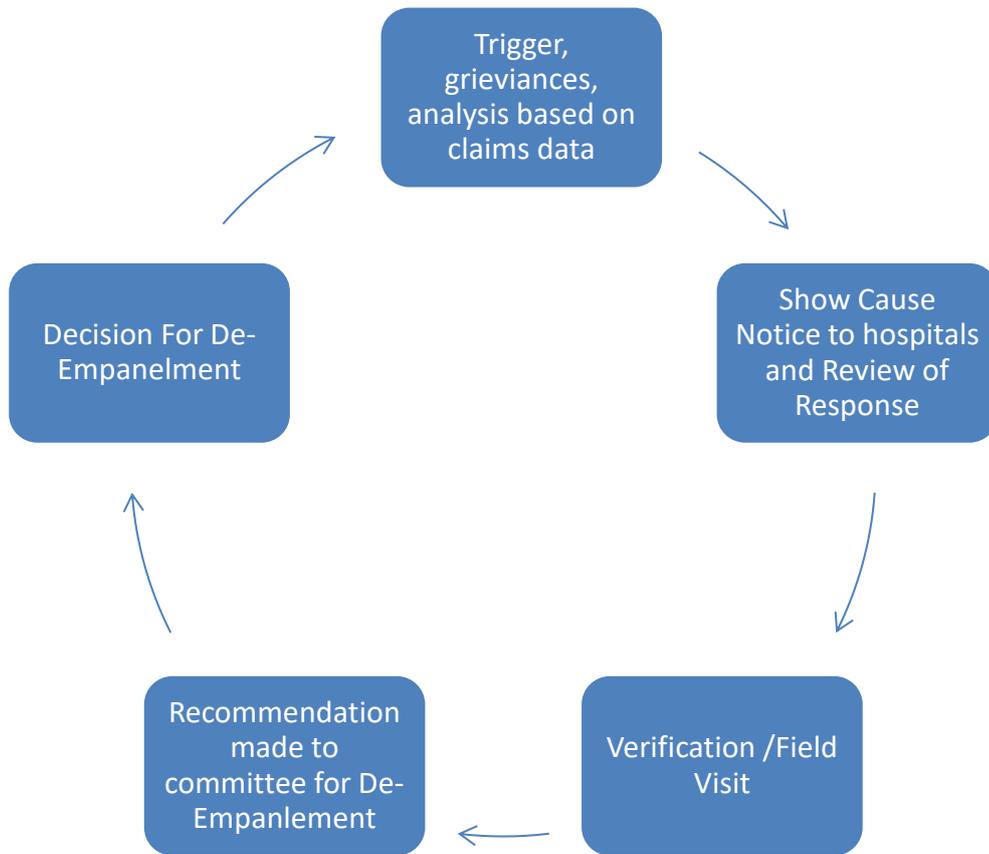
### **1.7. Post De-empanelment Phase**

Once de-empanelled, the Hospital cannot seek for re-empanelment until completion of 1 year from the date of such de-empanelment.

### **1.7. Appellate Authority**

The hospital can approach the Principal Secretary, Department of Health and Family Welfare, if they are not agreeable with the decision of the EDC. The Principal Secretary, Department of Health and Family Welfare, will take a final view of the receipt of representation. However, the hospital will continue to be de-empanelled until the time a final view is taken by the Principal Secretary.

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**Process flow of the review by EDC (Figure 2)**

\*Note that the entire process should be completed within 30 days from the date of suspension. \*\* Penalties will be fixed by the Empanelment & Disciplinary Committee which shall be issued from time to time.