

Performance Outcomes System Initial Reports

Report run on March 13, 2018

Background

Three reports will be created during each new reporting period. The reports that will be produced are as follows: statewide aggregate data; population-based county groups; and county-specific data. These reports help meet the intent of the Legislature, as stated in Welfare and Institutions Code Section 14707.5, to develop a performance outcomes system for Early and Periodic Screening, Diagnosis, and Treatment (EPSDT) mental health services that will improve outcomes at the individual, program, and system levels and inform fiscal decision-making related to the purchase of services. This reporting effort is part of the implementation of a performance outcomes system for Medi-Cal Specialty Mental Health Services (SMHS) for children and youth.

Since 2012 DHCS has worked with several groups of stakeholders to create a structure for reporting, to develop the Performance Measurement Paradigm, and to develop indicators and measures. The Performance Outcomes System will be used to evaluate the domains of access, engagement, service appropriateness to need, service effectiveness, linkages, cost effectiveness and satisfaction. Further information on the Performance Measures System implementation is available on the DHCS website. Documents posted include the relevant legislation, plans submitted to the Legislature, and handouts for meetings with the Stakeholder Advisory Committee back to the first meeting in 2012. To obtain this information go to:

<http://www.dhcs.ca.gov/provgovpart/pos/Pages/default.asp>

Purpose and Overview

These county-specific reports provide updated information on the initial indicators that were developed for the Performance Outcomes System and reported on at the statewide aggregate level in February 2015; they help establish a foundation for on-going reporting. DHCS plans to move to annual reporting of this data for the Performance Outcomes System.

The first series of charts and tables focus on the demographics of children and youth under 21 who are receiving SMH' based on approved claims for Medi-Cal eligible beneficiaries. Specifically, this includes demographics tables of this population by age, gender, and race/ethnicity. Two types of penetration information are provided. Both penetration rates tables are also broken out by demographic characteristics. Utilization of services data are shown in terms of dollars, as well as by service, in time increments. The snapshot table provides a point-in-time view of children/youth arriving, exiting, and continuing services over a two-year period. The time to step down table provides a view over the past four years of the time to step-down services following inpatient discharge.

Where possible, the reports provide trend information by displaying information for four Fiscal Years (FY). A FY is from July 1st to June 30th.

Utilization of services reports are shown in terms of dollars, as well as by service in time increments. The snapshot report provides a point-in-time view of children arriving, exiting, and continuing services over a two-year period. The final report provides a view over the past four years of the time to step-down services (i.e., time to next contact after an inpatient discharge). **Note:** *The time to step-down report has a change in methodology from the first report produced in February 2015. In the initial report only outpatient services provided at least one day after the inpatient discharge were included in the calculations. On subsequent reports, any outpatient service that occurs on or after the inpatient discharge is included in the analysis.*

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Definitions

Population - Beneficiaries with approved services adjudicated through the Short Doyle/Medi-Cal II claiming system that were:

- Age 20 or younger during the approved date of service on the claim.

Data Sources - Short-Doyle/Medi-Cal II (SD/MC II) claims with dates of service in FY 13/14 through FY 16/17.

- Medi-Cal Eligibility Data System (MEDS) data from the Management Information System/Decision Support System (MIS/DSS) FY 13/14 through FY16/17.

Additional Information

The **Measures Catalog** is the companion document for these reports and provides the methodology and definitions for the measures. Each measure is defined and the numerator and denominator used to develop the metrics are provided with relevant notes and additional references. The Measures Catalog may be found at: <http://dhcs.ca.gov/provgovpart/pos/Pages/Performance-Outcomes-System-Reports-and-Measures-Catalog.aspx>

Note on Privacy: The Health Insurance Portability and Accountability Act (HIPAA) and Code of Federal Regulations (CFR) 42 rules protect most individually identifiable health information in any form or medium, medium, whether electronic, on paper, or oral. DHCS has strict rules in place to protect the identification of individuals in public reports. A "Public Aggregate Reporting – DHCS Business Reports" process has been established to maintain confidentiality of client Personal Information. The Performance Outcomes System complies with Federal and State privacy laws. Thus, the POS must appropriately and accurately de-identify data for public reporting. Due to privacy concerns, some cells in this report may have been suppressed to comply with state and federal rules. When necessary, this data is represented as follows: 1) Data that is missing is indicated as "-" 2) Data that has been suppressed due to privacy concerns is indicated as "^".

Report Interpretation

*County-specific findings may be interpreted alongside the POS statewide and population-based report findings.

*The **penetration rates** reported here were calculated using a different methodology than that used by the External Quality Review Organization (EQRO). The differences in methodology make comparison between the POS penetration rates and the EQRO penetration rates not appropriate or useful. The POS methodology for calculating penetration rates was selected because it is easier to compute, more straightforward to interpret, and is in use by other states and counties. For the POS, the penetration rate is calculated by taking the total number of youth who received X number of SMHS (1 or 5 for POS) in a FY and dividing that by the total number of Medi-Cal eligible youth for that FY. This methodology results in lower penetration rates as compared to the EQRO rates, but it does so across the board so that all counties and the state will be similarly impacted.

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*The **snapshot** report provides a point-in-time look at children and youth's movement through the SMHS system. The report uses five general categories to classify if a youth is entering, exiting, continuing services, or a combination of these categories (e.g., arriving and exiting). Eventually the snapshot data will be used along with measures of service effectiveness to identify whether youth are improving as a result of receiving services from the time they first arrived in the system to when they exit the system. This methodology was adapted from the California Mental Health and Substance Use System Needs Assessment (2012). More information on the original methodology can be found here:
<http://www.dhcs.ca.gov/provgovpart/pos/Pages/Performance-Outcomes-System-Reports-and-Measures-Catalog.aspx>

*The psychiatric emergency services/hospital data reported on in the **time to step-down services** report includes data from Short Doyle/Medi-Cal II claims data and fee-for-service data. In the future this report will incorporate other outpatient and inpatient Medi-Cal SMHS' billed through the Managed Care healthcare delivery systems. Currently, the number of days is capped at 365 days (to mitigate the impact of extreme statistical anomalies) when calculating the mean and max for time between discharge and step down service. This methodology will be updated in the next reporting cycle. Additionally, county specific and population-based reports are based off of the county of fiscal responsibility for the patient and whom has been attributed the time to next service in days used in the calculations for this indicator.

Please contact cmhpos@dhcs.ca.gov for any questions regarding this report.

**Demographics Report: Unique Count of Children and Youth Receiving SMHS by Fiscal Year
Sutter/Yuba Counties as of March 13, 2018**

SFY	Unique Count Receiving SMHS*	Year-Over-Year Percentage Change	Unique Count of Medi-Cal Eligibles	Year-Over-Year Percentage Change
FY 13-14	1,154		32,467	
FY 14-15	1,264	9.5%	34,089	5.0%
FY 15-16	1,235	-2.3%	35,724	4.8%
FY 16-17	1,209	-2.1%	36,285	1.6%
Compound Annual Growth Rate SFY**		1.6%		3.8%

**SMHS = Specialty Mental Health Services. See Measures Catalog for more detailed information.*

***SFY = State Fiscal Year which is July 1 through June 30.*

**Demographics Report: Unique Count of Children and Youth Receiving SMHS by Fiscal Year
Sutter/Yuba Counties as of March 13, 2018**

Fiscal Year	Alaskan Native or American Indian Count	Alaskan Native or American Indian %	Asian or Pacific Islander Count	Asian or Pacific Islander %	Black Count	Black %	Hispanic Count	Hispanic %	White Count	White %	Other Count	Other %	Unknown Count	Unknown %
FY 13-14	18	1.6%	19	1.6%	35	3.0%	333	28.9%	626	54.2%	^	^	^	^
FY 14-15	17	1.3%	29	2.3%	52	4.1%	368	29.1%	662	52.4%	14	1.1%	122	9.7%
FY 15-16	16	1.3%	25	2.0%	43	3.5%	327	26.5%	684	55.4%	11	0.9%	129	10.4%
FY 16-17	23	1.9%	23	1.9%	31	2.6%	347	28.7%	660	54.6%	^	^	^	^

**This report uses the Medi-Cal Eligibility Data System for racial data, while CDSS uses the Child Welfare Services/Case Management System.*

^ Data has been suppressed to protect patient privacy.

**Demographics Report: Unique Count of Children and Youth Receiving SMHS by Fiscal Year
Sutter/Yuba Counties as of March 13, 2018**

Fiscal Year	Children 0-2 Count	Children 0-2 %	Children 3-5 Count	Children 3-5 %	Children 6-11 Count	Children 6-11 %	Children 12-17 Count	Children 12-17 %	Youth 18-20 Count	Youth 18-20 %
FY 13-14	^	^	50	4.3%	424	36.7%	509	44.1%	^	^
FY 14-15	^	^	50	4.0%	442	35.0%	598	47.3%	^	^
FY 15-16	^	^	52	4.2%	400	32.4%	592	47.9%	^	^
FY 16-17	^	^	56	4.6%	378	31.3%	597	49.4%	^	^

^ Data has been suppressed to protect patient privacy.

**Demographics Report: Unique Count of Children and Youth Receiving SMHS by Fiscal Year
Sutter/Yuba Counties as of March 13, 2018**

Fiscal Year	Female Count	Female %	Male Count	Male %
FY 13-14	497	43.1%	657	56.9%
FY 14-15	548	43.4%	716	56.6%
FY 15-16	542	43.9%	693	56.1%
FY 16-17	557	46.1%	652	53.9%

Penetration Rates* Report: Children and Youth with At Least One SMHS Visit
Sutter/Yuba Counties as of March 13, 2018**

	FY 13-14			FY 14-15			FY 15-16			FY 16-17		
	Children and Youth with 1 or more SMHS Visits	Certified Eligible Children and Youth	Penetration Rate	Children and Youth with 1 or more SMHS Visits	Certified Eligible Children and Youth	Penetration Rate	Children and Youth with 1 or more SMHS Visits	Certified Eligible Children and Youth	Penetration Rate	Children and Youth with 1 or more SMHS Visits	Certified Eligible Children and Youth	Penetration Rate
All	1,154	32,467	3.6%	1,264	34,089	3.7%	1,235	35,724	3.5%	1,209	36,285	3.3%
Children 0-2	^	5,200	^	^	5,397	^	^	5,518	^	^	5,515	^
Children 3-5	50	5,304	0.9%	50	5,312	0.9%	52	5,472	1.0%	56	5,454	1.0%
Children 6-11	424	10,013	4.2%	442	10,487	4.2%	400	10,983	3.6%	378	11,080	3.4%
Children 12-17	509	8,453	6.0%	598	8,909	6.7%	592	9,514	6.2%	597	9,863	6.1%
Youth 18-20	^	3,497	^	^	3,984	^	^	4,237	^	^	4,373	^
Alaskan Native or American Indian	18	237	7.6%	17	245	6.9%	16	236	6.8%	23	234	9.8%
Asian or Pacific Islander	19	3,862	0.5%	29	4,068	0.7%	25	4,256	0.6%	23	4,463	0.5%
Black	35	806	4.3%	52	873	6.0%	43	889	4.8%	31	918	3.4%
Hispanic	333	13,203	2.5%	368	13,822	2.7%	327	14,639	2.2%	347	14,815	2.3%
White	626	11,611	5.4%	662	12,015	5.5%	684	12,303	5.6%	660	12,264	5.4%
Other	^	509	^	14	505	2.8%	11	491	2.2%	^	420	^
Unknown	^	2,239	^	122	2,561	4.8%	129	2,910	4.4%	^	3,171	^
Female	497	15,881	3.1%	548	16,643	3.3%	542	17,430	3.1%	557	17,700	3.1%
Male	657	16,586	4.0%	716	17,446	4.1%	693	18,294	3.8%	652	18,585	3.5%

*Penetration Rate is defined as the percentage of SMHS eligible beneficiaries that have received a SMHS that was claimed via the Short-Doyle/Medi-Cal claiming system.

**Children and Youth that have received at least one SMHS that was claimed through the Short-Doyle/ Medi-Cal claiming system on at least one (1) day in the Fiscal Year.

^ Data has been suppressed to protect patient privacy.

Penetration Rates* Report: Children and Youth with Five or More SMHS Visits
Sutter/Yuba Counties as of March 13, 2018**

	FY 13-14			FY 14-15			FY 15-16			FY 16-17		
	Children and Youth with 5 or more SMHS Visits	Certified Eligible Children and Youth	Penetration Rate	Children and Youth with 5 or more SMHS Visits	Certified Eligible Children and Youth	Penetration Rate	Children and Youth with 5 or more SMHS Visits	Certified Eligible Children and Youth	Penetration Rate	Children and Youth with 5 or more SMHS Visits	Certified Eligible Children and Youth	Penetration Rate
All	843	32,467	2.6%	902	34,089	2.6%	825	35,724	2.3%	830	36,285	2.3%
Children 0-2	0	5,200	0.0%	^	5,397	^	^	5,518	^	0	5,515	0.0%
Children 3-5	32	5,304	0.6%	23	5,312	0.4%	34	5,472	0.6%	32	5,454	0.6%
Children 6-11	350	10,013	3.5%	344	10,487	3.3%	289	10,983	2.6%	285	11,080	2.6%
Children 12-17	377	8,453	4.5%	445	8,909	5.0%	410	9,514	4.3%	436	9,863	4.4%
Youth 18-20	84	3,497	2.4%	^	3,984	^	^	4,237	^	77	4,373	1.8%
Alaskan Native or American Indian	12	237	5.1%	15	245	6.1%	12	236	5.1%	17	234	7.3%
Asian or Pacific Islander	13	3,862	0.3%	17	4,068	0.4%	11	4,256	0.3%	11	4,463	0.2%
Black	26	806	3.2%	36	873	4.1%	32	889	3.6%	17	918	1.9%
Hispanic	224	13,203	1.7%	245	13,822	1.8%	215	14,639	1.5%	218	14,815	1.5%
White	471	11,611	4.1%	489	12,015	4.1%	463	12,303	3.8%	474	12,264	3.9%
Other	^	509	^	^	505	^	^	491	^	^	420	^
Unknown	^	2,239	^	^	2,561	^	^	2,910	^	^	3,171	^
Female	348	15,881	2.2%	392	16,643	2.4%	358	17,430	2.1%	378	17,700	2.1%
Male	495	16,586	3.0%	510	17,446	2.9%	467	18,294	2.6%	452	18,585	2.4%

*Penetration Rate is defined as the percentage of SMHS eligible beneficiaries that have received a SMHS that was claimed via the Short-Doyle/Medi-Cal claiming system.

**Children and Youth that have received at least five SMHS that were claimed through the Short-Doyle/ Medi-Cal claiming system on at least five (5) or more different days in the Fiscal Year. ^ Data has been suppressed to protect patient privacy.

**Utilization Report*: Approved Specialty Mental Health Services for Children and Youth
Mean Expenditures and Mean Service Quantity per Unique Beneficiary by Fiscal Year
Sutter County as of March 13, 2018**

Fiscal Year	SDMC Total Approved	IHBS (Minutes)	ICC (Minutes)	Case Management/ Brokerage (Minutes)	Mental Health Services (Minutes)	Therapeutic Behavioral Services (Minutes)	Medication Support Services (Minutes)	Crisis Intervention (Minutes)	Crisis Stabilization (Hours)	Full Day Treatment Intensive (Hours)	Full Day Rehabilitation (Hours)	Hospital Inpatient (Days)	Hospital Inpatient Admin (Days)	Fee for Service Inpatient (Days)	Crisis Residential Treatment Services (Days)	Adult Residential Treatment Services (Days)	Psychiatric Health Facility (Days)
FY 13-14	\$ 6,224	0	0	598	1,327	3,464	319	194	11	865	294	1	0	11	0	0	20
FY 14-15	\$ 6,131	981	1,445	531	1,373	2,182	291	194	26	810	399	0	0	8	0	0	6
FY 15-16	\$ 5,721	122	942	470	1,285	4,978	306	187	29	1,206	493	0	0	9	0	0	21
FY 16-17	\$ 6,885	1,362	882	463	1,413	3,535	357	228	19	0	0	6	0	11	0	0	8
MEAN	\$ 6,240	821	1,090	516	1,349	3,540	318	201	21	960	395	4	0	10	0	0	14

**The graphs are color coded so that those reported in the same unit of analysis (e.g., minutes) are colored similarly.*

Please note that (n) values listed at the bottom of each bar graph represent the actual number of children/youth that received the SMHS represented in their respective graph by Fiscal Year.

**Snapshot Report: Unique Count of Children and Youth Receiving SMHS
Arriving, Exiting, and with Service Continuance by Fiscal Year
Sutter County as of March 13, 2018**

Category	Description (Please refer to the Measures Catalog for more detailed descriptions on all Performance Outcomes System measures.)
Arrivals	Children/Youth that did not receive any SMHS within 3 months of their first date of service in the Fiscal Year.
Service Continuance	Children/Youth receiving continuous services with no breaks in service greater than 90 days for a period of at least 2 years (>= 2 YR) or a period of 1 to 2
Exiting	Children/Youth that did not receive any SMHS within 3 months after their last date of service in the Fiscal Year.
Arriving & Exiting	A distinct category in which children/youth met both the criteria for Arrivals and Exiting above for the fiscal year.
Service Continuance	A distinct category in which Children/Youth had at least 2 years of Service Continuance going into the Fiscal Year and then Exited within the same Fiscal Year.

Service Fiscal Year	Arrivals Count	Arrivals %	Service Continuance (>= 2 YR) Count	Service Continuance (>= 2 YR) %	Service Continuance (<2 YR) Count	Service Continuance (< 2 YR) %	Exiting Count	Exiting %	Arriving & Exiting Count	Arriving & Exiting %	Service Continuance (>= 2 YR) & Exiting Count	Service Continuance (>= 2 YR) and Exiting %	Total Count	Total %
FY 13-14	146	23.6%	88	14.2%	67	10.8%	108	17.5%	184	29.8%	25	4.0%	618	100%
FY 14-15	160	23.4%	99	14.5%	57	8.3%	117	17.1%	211	30.9%	39	5.7%	683	100%
FY 15-16	119	18.0%	75	11.4%	56	8.5%	136	20.6%	225	34.1%	49	7.4%	660	100%
FY 16-17	161	25.7%	66	10.5%	54	8.6%	94	15.0%	213	34.0%	39	6.2%	627	100%

Time to Step Down Report: Children and Youth Stepping Down in SMHS Services Post Inpatient Discharge*
Sutter County as of March 13, 2018

Service FY	Count of Inpatient Discharges with Step Down within 7 Days of Discharge	Percentage of Inpatient Discharges with Step Down within 7 Days of Discharge	Count of Inpatient Discharges with Step Down Between 8 and 30 Days	Percentage of Inpatient Discharges with Step Down Between 8 and 30 Days	Count of Inpatient Discharges with a Step Down > 30 Days from Discharge	Percentage of Inpatient Discharges with a Step Down > 30 Days from Discharge	Count of Inpatient Discharges with No Step Down*	Percentage of Inpatient Discharges with No Step Down*	Minimum Number of Days between Discharge and Step Down	Maximum Number of Days between Discharge and Step Down	Mean Time to Next Contact Post Inpatient Discharge (Days)	Median Time to Next Contact Post Inpatient Discharge (Days)
FY 13-14	36	66.7%	12	22.2%	^	^	^	^	0	136	11.5	1
FY 14-15	40	70.2%	^	^	^	^	^	^	0	87	7.4	0
FY 15-16	29	64.4%	^	^	0	0.0%	^	^	0	24	5.8	1
FY 16-17	50	69.4%	16	22.2%	^	^	^	^	0	201	11.4	1

* **No Step Down** is defined as no Medi-Cal eligible service was claimed through Short-Doyle/Medi-Cal after a claimed inpatient service was billed with a discharge date. This category may include data
 ^ Data has been suppressed to protect patient privacy.

**Utilization Report*: Approved Specialty Mental Health Services for Children and Youth
Mean Expenditures and Mean Service Quantity per Unique Beneficiary by Fiscal Year
Yuba County as of March 13, 2018**

Fiscal Year	SDMC Total Approved	IHBS (Minutes)	ICC (Minutes)	Case Management/ Brokerage (Minutes)	Mental Health Services (Minutes)	Therapeutic Behavioral Services (Minutes)	Medication Support Services (Minutes)	Crisis Intervention (Minutes)	Crisis Stabilization (Hours)	Full Day Treatment Intensive (Hours)	Full Day Rehabilitation (Hours)	Hospital Inpatient (Days)	Hospital Inpatient Admin (Days)	Fee for Service Inpatient (Days)	Crisis Residential Treatment Services (Days)	Adult Residential Treatment Services (Days)	Psychiatric Health Facility (Days)
FY 13-14	\$ 5,566	204	825	476	1,560	0	281	184	20	225	264	0	0	12	0	0	6
FY 14-15	\$ 5,711	0	1,092	420	1,458	931	269	193	10	0	1,380	1	0	10	0	0	5
FY 15-16	\$ 5,674	235	801	436	1,454	10,499	265	217	13	0	18	0	0	8	0	0	5
FY 16-17	\$ 6,682	1,138	250	410	1,564	2,616	282	208	11	0	0	0	0	12	0	0	6
MEAN	\$ 5,908	526	742	435	1,509	4,682	274	200	14	225	554	1	0	10	0	0	5

**The graphs are color coded so that those reported in the same unit of analysis (e.g., minutes) are colored similarly.*

Please note that (n) values listed at the bottom of each bar graph represent the actual number of children/youth that received the SMHS represented in their respective graph by Fiscal Year.

**Snapshot Report: Unique Count of Children and Youth Receiving SMHS
Arriving, Exiting, and with Service Continuance by Fiscal Year
Yuba County as of March 13, 2018**

Category	Description (Please refer to the Measures Catalog for more detailed descriptions on all Performance Outcomes System measures.)
Arrivals	Children/Youth that did not receive any SMHS within 3 months of their first date of service in the Fiscal Year.
Service Continuance	Children/Youth receiving continuous services with no breaks in service greater than 90 days for a period of at least 2 years (≥ 2 YR) or a period of 1 to 2
Exiting	Children/Youth that did not receive any SMHS within 3 months after their last date of service in the Fiscal Year.
Arriving & Exiting	A distinct category in which children/youth met both the criteria for Arrivals and Exiting above for the fiscal year.
Service Continuance	A distinct category in which Children/Youth had at least 2 years of Service Continuance going into the Fiscal Year and then Exited within the same Fiscal Year.

Service Fiscal Year	Arrivals Count	Arrivals %	Service Continuance (≥ 2 YR) Count	Service Continuance (≥ 2 YR) %	Service Continuance (<2 YR) Count	Service Continuance (< 2 YR) %	Exiting Count	Exiting %	Arriving & Exiting Count	Arriving & Exiting %	Service Continuance (≥ 2 YR) & Exiting Count	Service Continuance (≥ 2 YR) and Exiting %	Total Count	Total %
FY 13-14	142	26.5%	71	13.2%	53	9.9%	91	17.0%	143	26.7%	36	6.7%	536	100%
FY 14-15	155	26.7%	55	9.5%	50	8.6%	111	19.1%	172	29.6%	38	6.5%	581	100%
FY 15-16	110	19.1%	69	12.0%	59	10.3%	120	20.9%	192	33.4%	25	4.3%	575	100%
FY 16-17	137	23.5%	57	9.8%	48	8.2%	109	18.7%	196	33.7%	35	6.0%	582	100%

Time to Step Down Report: Children and Youth Stepping Down in SMHS Services Post Inpatient Discharge*
Yuba County as of March 13, 2018

Service FY	Count of Inpatient Discharges with Step Down within 7 Days of Discharge	Percentage of Inpatient Discharges with Step Down within 7 Days of Discharge	Count of Inpatient Discharges with Step Down Between 8 and 30 Days	Percentage of Inpatient Discharges with Step Down Between 8 and 30 Days	Count of Inpatient Discharges with a Step Down > 30 Days from Discharge	Percentage of Inpatient Discharges with a Step Down > 30 Days from Discharge	Count of Inpatient Discharges with No Step Down*	Percentage of Inpatient Discharges with No Step Down*	Minimum Number of Days between Discharge and Step Down	Maximum Number of Days between Discharge and Step Down	Mean Time to Next Contact Post Inpatient Discharge (Days)	Median Time to Next Contact Post Inpatient Discharge (Days)
FY 13-14	21	63.6%	^	^	^	^	^	^	0	244	20.8	3
FY 14-15	37	66.1%	^	^	^	^	^	^	0	222	12.4	1
FY 15-16	28	73.7%	^	^	^	^	^	^	0	70	7.1	2
FY 16-17	52	68.4%	16	21.1%	^	^	^	^	0	44	6.2	1

* **No Step Down** is defined as no Medi-Cal eligible service was claimed through Short-Doyle/Medi-Cal after a claimed inpatient service was billed with a discharge date. This category may include data
 ^ Data has been suppressed to protect patient privacy.