

Effectiveness assessment in the Portuguese Regulation Authority

Malmö, September 2019



ERS

**ENTIDADE
REGULADORA
DA SAÚDE**

Background

- **Since 2013, ERS has an internal system of measuring its performance in terms of:**
 - ✓ Productivity and quality of work by departments
 - ✓ Productivity and quality of work by individual workers
 - ✓ Compliance with laws and rules by departments and workers
- **Example of indicators:**
 - ✓ No. of patient complaints closed
 - ✓ % of patient complaints closed within 30 days
 - ✓ No. of investigations carried out
 - ✓ No. of inspections per 100 providers
 - ✓ % of licenses issued within the legal deadline

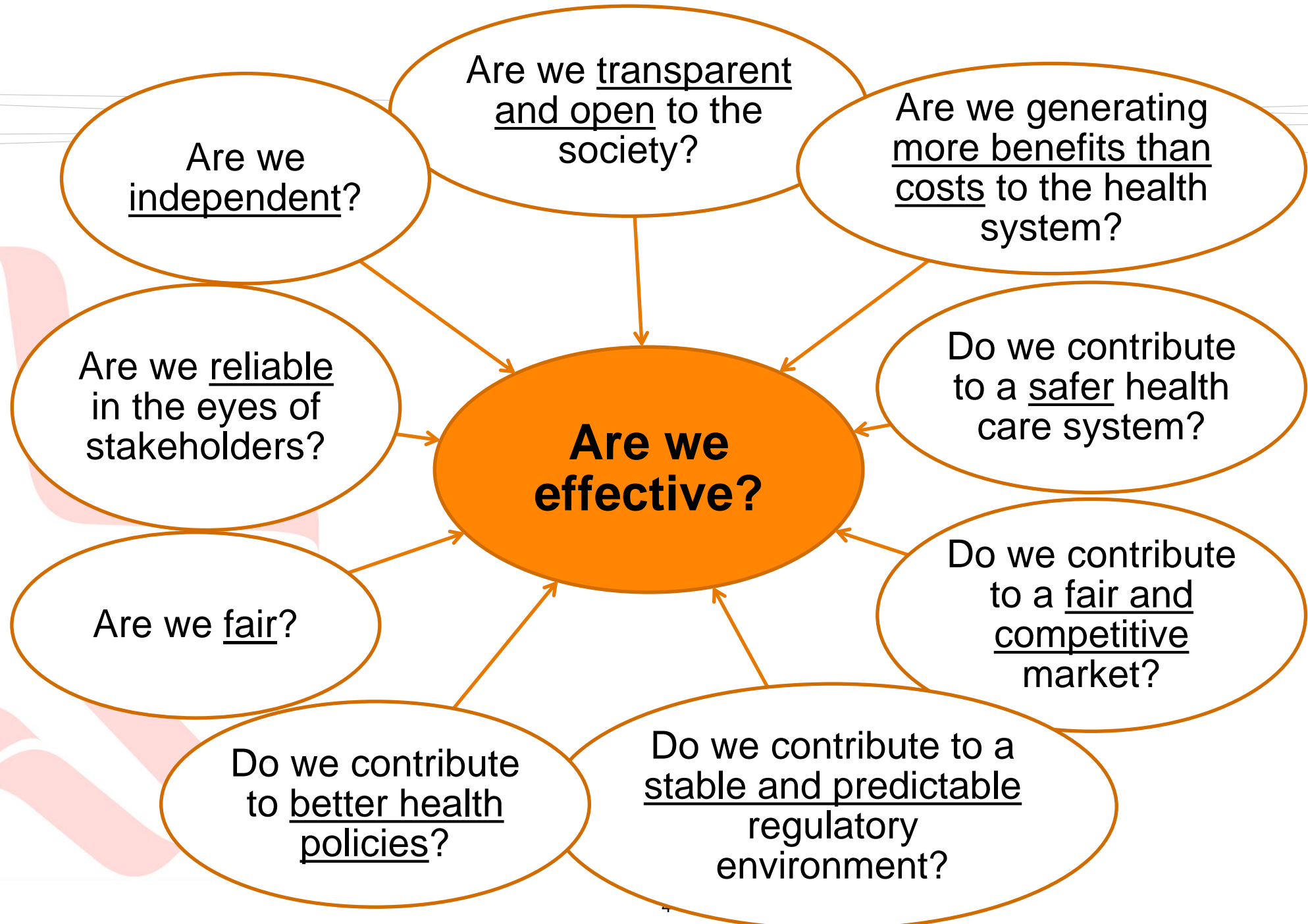
Background

▪ What does this measure?

- ✓ Are we doing what our statutes set forth?
- ✓ Are we doing it “by the book” (e.g. within dead lines)?
- ✓ Are we increasing the efficiency of our work?
- ▶ Effectiveness and efficiency in internal procedures, both in core regulation activities and support activities

▪ What is not being measured?

- ✓ **Impact:** what is the outcome of our interventions in terms of how well the health system performs? Are we accomplishing our mission?
- ✓ **Cost-effectiveness:** do the benefits of such outcome surpass the direct and indirect costs of our activities?
- ▶ Do we justify our own existence or is the health system the same (or better) without us?



Our views on effectiveness assessment

Dimensions for effectiveness assessment:

- 1. Impact of regulation vis-à-vis ERS statutory objectives**
- 2. ERS respect for its principles of action**
- 3. Deterrent effect of ERS on the regulated providers**
- 4. Feeling of protection by ERS among citizens**

Our views on effectiveness assessment

1. Impact of regulation vis-à-vis ERS statutory objectives

What to measure	How to measure
<p>Objectives of regulation:</p> <ol style="list-style-type: none">1) Compliance with legal requirements2) Protection of patients rights3) Ensuring access to health care4) Ensuring patient safety and health care quality5) Ensuring legality and transparency in economic relations6) Promoting fair competition in health care markets	<p>Define indicators that capture, <u>for each objective</u>:</p> <ul style="list-style-type: none">- incidence of problems- overall performance of the health system <p>Set targets</p> <p>Measure performance</p>

Our views on effectiveness assessment

2. ERS respect for its principles of action

What to measure	How to measure
Independence	frequency of regulatory interventions not directly requested by stakeholders
Transparency	extent and detail of publications about ERS activities
	surveys to providers and citizens
Openness and proximity	citations of ERS activities and statements in the media and social media
	word-of-mouth measurement on the internet
	surveys to providers and citizens

Our views on effectiveness assessment

3. Deterrent effect of ERS on the regulated providers

What to measure	How to measure
Compliance with orders issued by ERS	follow-up monitoring of compliance
Adherence to recommendations issued by ERS	follow-up monitoring of adherence
Sentiment of deterrence declared by the regulated	results of survey of regulated providers

Our views on effectiveness assessment

4. Feeling of protection by ERS among citizens

What to measure	How to measure
Sentiment of protection declared by citizens	results of citizen surveys
Frequency of citizens reaching ERS for help	frequency of patient complaints presented directly to ERS
	no. phone calls, emails and letters requesting information and help
	no. of visits, searches and downloads on ERS website

What are we assessing?

Activities we undergo that allow for some impact assessment:

- **Follow-up of investigations and systemic problems identified:**
 - ✓ Monitoring of providers targeted in previous regulatory interventions
 - ✓ Update of relevant statistical analyses
 - ✓ Inspection programmes targeting providers with an history of misconduct and areas of higher risk
- **Surveys to ask stakeholders' feedback about our activities:**
 - ✓ Following an inspection
 - ✓ Following an audit
 - ✓ Following a registering and licencing procedure
 - ✓ Following attendance by phone or in person

What are we assessing?

Questions to consider:

- Are follow-ups on previous regulatory interventions a good way to assess our impact and effectiveness? Can we prove the link between improvement and our intervention?
- Are we just assessing the effectiveness of our actions and not caring about our omissions?
- Can we transform discrete follow-ups into continuous monitoring?
- Are feed-backs from stakeholders completely honest and unbiased? Do they tell us something about real impacts of our activities?