

# *An Evaluation of the Completeness of China's Provincial Medical Insurance Payment Qualification System: A Text Analysis Based on the PMC Index Model*

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**Abstract:** To assess the comprehensiveness of provincial policies governing medical insurance payment eligibility in China and identify priorities for policy refinement. Thirty-four provincial policy texts published by 1 January 2026 were evaluated using a Policy Modeling Consistency (PMC) index framework comprising nine primary dimensions and 31 secondary indicators. The mean PMC index was 6.40, indicating a good overall level. Eight policies were rated excellent, 22 good, and 5 average. Policy content (X3), implementation (X4), evaluation (X8), and audience coverage (X9) each scored 1.00. The weakest dimensions were timeliness (X2=0.14), policy guarantee (X6=0.49), and publicity (X7=0.44). Provincial policies have largely established an individual-oriented supervisory framework, but policy-cycle design, credit-result application, and public disclosure remain incomplete. Lifecycle management, credit linkage, and public participation should therefore be strengthened.

## 1. Introduction

China's medical insurance fund supervision has historically focused on institutions, including preceded the national system. Beijing's Chaoyang District explored physician filing management, pilot work on medical-insurance credit systems began in multiple cities, Shanghai strengthened payment-settlement restrictions, and some localities tested point-based or agreement-based arrangements [24,26–28]. Comparable foreign systems differ in legal form but share a governance logic: the United States uses exclusion lists and payment restrictions for providers engaged in misconduct, whereas Germany combines qualification, monitoring, and payment-related controls for statutory health-insurance practice [6–8]. These experiences indicate that effective supervision requires an institutional chain linking access, conduct, accountability, and consequences.

Existing Chinese studies have examined institutional rationale, legal responsibility, and implementation pathways, but the policy texts issued by provinces have rarely been compared systematically [2–5,22,23]. This study therefore evaluates the textual completeness of provincial

payment qualification policies. It asks whether provincial texts contain the core institutional components required for implementation and where common design gaps remain. The contribution is deliberately limited to policy-text completeness: a higher PMC score does not itself prove stronger implementation or deterrence [9,18].

## 2. Data and Methods

### 2.1 Sample and data collection

The sample comprises 34 valid provincial-level documents, including implementation rules and handling procedures, issued by provinces, autonomous regions, and municipalities directly under the central government by 1 January 2026. Documents were retrieved from provincial healthcare-security administration websites, the Peking University Law Database, and Renshetong. Eligible texts had to: (1) be provincial-level implementation rules or handling procedures; (2) contain specific provisions on medical insurance payment qualification management; and (3) be publicly released by the cut-off date. Each document was treated as an independent policy text. This permits assessment of textual completeness, while recognising that documents may differ in legal status and operational purpose.

### 2.2 PMC index framework

The PMC index model, proposed by Estrada, is a text-based approach for evaluating the consistency and completeness of a policy's internal design [10]. It has been widely adapted in Chinese policy studies, including research on health, medical-insurance, social-security, elderly-care, and public-policy texts [11–15,19–21,29,31–34]. Following this literature and the high-frequency terms extracted with ROST CM 6.0, the present study constructed nine primary variables and 31 binary secondary variables (Table 1).

Table 1. Simplified PMC Evaluation Criteria

| Dimension         | Core secondary indicators                                          | Coding focus                                                       |
|-------------------|--------------------------------------------------------------------|--------------------------------------------------------------------|
| X1 Policy nature  | Support; supervision; suggestions; feedback                        | Whether the text provides operational and feedback arrangements    |
| X2 Timeliness     | Long-, medium-, or short-term validity                             | Whether a validity period or review horizon is stated              |
| X3 Policy content | Point rules; sanctions; liability; restoration; dynamic management | Whether the core management chain is specified                     |
| X4 Implementation | Departmental coordination; local adaptation; procedures            | Whether linked responsibilities and operating procedures are clear |
| X5 Support        | Training; social participation                                     | Whether capacity building and external participation are provided  |
| X6 Guarantee      | IT support; credit evaluation; credit-result application           | Whether technical and credit safeguards are operationalised        |
| X7 Publicity      | Publicity guidance; information disclosure                         | Whether interpretation and disclosure duties are included          |
| X8 Evaluation     | Basis; objectives; scheme; planning; rights and responsibilities   | Whether the policy design is complete and accountable              |
| X9 Audience       | Institutions; pharmacies; agencies; health departments             | Whether all principal implementation actors are covered            |

The dimensions cover policy nature (X1), timeliness (X2), content (X3), implementation (X4), support (X5), guarantee (X6), publicity (X7), evaluation (X8), and audience (X9). Each secondary indicator received a value of 1 when the required item was explicitly present in a policy text and 0 otherwise. The score for each primary variable was the arithmetic mean of its secondary indicators;

the overall PMC index was the sum of the nine primary-variable scores. The resulting theoretical range was 0–9. In line with the grading standard used in prior PMC studies, scores of 7–9 were classified as excellent, 6–6.99 as good, 4–5.99 as average, and 0–3.99 as poor [14,20]. PMC surface maps were used only as visual representations of the already calculated dimension scores.

### 3. Results

The 34 policy texts achieved a mean PMC score of 6.40, placing the provincial sample at the good level. Eight policies were excellent, 22 good, and 5 average; no policy was rated poor. Hunan (P4) had the highest score (8.08), followed by Xinjiang (P3, 7.58), while Shandong's handling procedures (P26) had the lowest score (5.33). Table 2 retains the original policy-level results and grades.

Table 2. PMC scores and grades of the 35 provincial policy texts

| No. | Region                    | X1          | X2          | X3          | X4          | X5          | X6          | X7          | X8          | X9          | PMC         | Grade       |
|-----|---------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| P1  | Hebei                     | 0.75        | 0.00        | 1.00        | 1.00        | 0.50        | 0.67        | 0.50        | 1.00        | 1.00        | 6.42        | Good        |
| P2  | Jiangxi                   | 0.50        | 0.00        | 1.00        | 1.00        | 0.83        | 0.67        | 1.00        | 1.00        | 1.00        | 7.00        | Excellent   |
| P3  | Xinjiang                  | 0.75        | 0.33        | 1.00        | 1.00        | 1.00        | 1.00        | 0.50        | 1.00        | 1.00        | 7.58        | Excellent   |
| P4  | Hunan                     | 0.75        | 0.33        | 1.00        | 1.00        | 1.00        | 1.00        | 1.00        | 1.00        | 1.00        | 8.08        | Excellent   |
| P5  | Chongqing                 | 0.50        | 0.00        | 1.00        | 1.00        | 0.50        | 0.33        | 0.50        | 1.00        | 1.00        | 5.83        | Average     |
| P6  | Sichuan                   | 0.75        | 0.33        | 1.00        | 1.00        | 0.83        | 0.33        | 0.00        | 1.00        | 1.00        | 6.24        | Good        |
| P7  | Shandong (rules)          | 0.50        | 0.33        | 1.00        | 1.00        | 0.83        | 0.67        | 0.00        | 1.00        | 1.00        | 6.33        | Good        |
| P8  | Shanxi                    | 0.75        | 0.00        | 1.00        | 1.00        | 0.50        | 0.67        | 0.50        | 1.00        | 1.00        | 6.42        | Good        |
| P9  | Liaoning                  | 0.75        | 0.33        | 1.00        | 1.00        | 0.50        | 0.33        | 0.50        | 1.00        | 1.00        | 6.41        | Good        |
| P10 | Tianjin                   | 0.75        | 0.33        | 1.00        | 1.00        | 0.50        | 0.33        | 0.50        | 1.00        | 1.00        | 6.41        | Good        |
| P11 | Qinghai                   | 0.75        | 0.33        | 1.00        | 1.00        | 0.83        | 0.33        | 0.50        | 1.00        | 1.00        | 6.74        | Good        |
| P12 | Henan                     | 0.75        | 0.00        | 1.00        | 1.00        | 0.50        | 0.67        | 0.50        | 1.00        | 1.00        | 6.42        | Good        |
| P13 | Heilongjiang (rules)      | 0.75        | 0.33        | 1.00        | 1.00        | 0.83        | 0.67        | 0.50        | 1.00        | 1.00        | 7.08        | Excellent   |
| P14 | Ningxia                   | 0.75        | 0.33        | 1.00        | 1.00        | 0.50        | 0.67        | 0.50        | 1.00        | 1.00        | 6.75        | Good        |
| P15 | Jilin                     | 0.75        | 0.00        | 1.00        | 1.00        | 0.83        | 0.67        | 0.50        | 1.00        | 1.00        | 6.75        | Good        |
| P16 | Zhejiang                  | 0.50        | 0.00        | 1.00        | 1.00        | 0.50        | 0.33        | 0.50        | 1.00        | 1.00        | 5.83        | Average     |
| P17 | Fujian                    | 0.50        | 0.33        | 1.00        | 1.00        | 0.83        | 0.67        | 0.50        | 1.00        | 1.00        | 6.83        | Good        |
| P18 | Inner Mongolia            | 0.75        | 0.00        | 1.00        | 1.00        | 0.50        | 0.67        | 0.50        | 1.00        | 1.00        | 6.42        | Good        |
| P19 | Guangxi                   | 0.75        | 0.00        | 1.00        | 1.00        | 0.50        | 0.33        | 0.50        | 1.00        | 1.00        | 6.08        | Good        |
| P20 | Yunnan                    | 0.50        | 0.00        | 1.00        | 1.00        | 0.50        | 0.33        | 0.50        | 1.00        | 1.00        | 5.83        | Average     |
| P21 | Gansu                     | 0.75        | 0.33        | 1.00        | 1.00        | 0.83        | 0.67        | 0.50        | 1.00        | 1.00        | 7.08        | Excellent   |
| P22 | Hubei (rules)             | 0.75        | 0.00        | 1.00        | 1.00        | 0.50        | 0.33        | 0.50        | 1.00        | 1.00        | 6.08        | Good        |
| P23 | Shanghai                  | 0.50        | 0.33        | 1.00        | 1.00        | 0.50        | 0.33        | 0.50        | 1.00        | 1.00        | 6.16        | Good        |
| P24 | Hainan                    | 0.75        | 0.33        | 1.00        | 1.00        | 0.83        | 0.67        | 0.50        | 1.00        | 1.00        | 7.08        | Excellent   |
| P25 | Anhui                     | 0.75        | 0.00        | 1.00        | 1.00        | 0.50        | 0.33        | 0.50        | 1.00        | 1.00        | 6.08        | Good        |
| P26 | Shandong (procedures)     | 0.50        | 0.00        | 1.00        | 1.00        | 0.50        | 0.33        | 0.00        | 1.00        | 1.00        | 5.33        | Average     |
| P27 | Jiangsu                   | 0.75        | 0.33        | 1.00        | 1.00        | 0.50        | 0.33        | 0.50        | 1.00        | 1.00        | 6.41        | Good        |
| P28 | Shaanxi                   | 0.75        | 0.00        | 1.00        | 1.00        | 0.50        | 0.33        | 0.50        | 1.00        | 1.00        | 6.08        | Good        |
| P29 | Jiangxi (procedures)      | 0.50        | 0.00        | 1.00        | 1.00        | 0.83        | 0.33        | 0.50        | 1.00        | 1.00        | 6.16        | Good        |
| P30 | Beijing                   | 0.75        | 0.00        | 1.00        | 1.00        | 0.83        | 0.33        | 0.50        | 1.00        | 1.00        | 6.41        | Good        |
| P31 | Guangdong                 | 0.75        | 0.33        | 1.00        | 1.00        | 0.83        | 0.67        | 0.50        | 1.00        | 1.00        | 7.08        | Excellent   |
| P32 | Heilongjiang (procedures) | 0.50        | 0.33        | 1.00        | 1.00        | 0.50        | 0.33        | 0.00        | 1.00        | 1.00        | 5.66        | Average     |
| P33 | Hubei (procedures)        | 0.50        | 0.00        | 1.00        | 1.00        | 0.50        | 0.33        | 0.50        | 1.00        | 1.00        | 5.83        | Average     |
| P34 | Guizhou                   | 0.75        | 0.00        | 1.00        | 1.00        | 0.83        | 0.33        | 0.50        | 1.00        | 1.00        | 6.41        | Good        |
|     | <b>Average</b>            | <b>0.62</b> | <b>0.14</b> | <b>1.00</b> | <b>1.00</b> | <b>0.62</b> | <b>0.49</b> | <b>0.44</b> | <b>1.00</b> | <b>1.00</b> | <b>6.40</b> | <b>Good</b> |

### 3.1 Dimension-level Patterns

Four dimensions were complete in every evaluated text: policy content (X3=1.00), implementation (X4=1.00), evaluation (X8=1.00), and audience coverage (X9=1.00). All policies specified key point-management content, including point scenarios, punishment consequences, responsibility determination, credit restoration, and dynamic management. They also specified procedural or coordination arrangements and clearly identified major policy audiences. These results indicate that the foundational architecture of the system has been widely transferred from national guidance into provincial policy texts.

However, the distribution was uneven (Table 3). Timeliness was the lowest-scoring dimension (X2=0.14), because many documents did not specify a formal validity period or review schedule. Policy guarantee averaged 0.49: technical support was generally present, but credit-result application was absent across the evaluated texts. Policy publicity averaged 0.44. Publicity guidance was relatively common (X7-1=0.89), whereas explicit information-disclosure provisions were rare (X7-2=0.06). Social participation was also limited (X5-2=0.46). The textual pattern is therefore one of strong internal administrative design but weaker external accountability, feedback, and renewal mechanisms.

Table 3. Key aggregate results retained from the original analysis

| Item                          | Result                                               |
|-------------------------------|------------------------------------------------------|
| Sample and grading            | 35 policies: 8 excellent; 22 good; 5 average; 0 poor |
| Overall PMC index             | 6.40                                                 |
| Highest and lowest            | P4 Hunan=8.08; P26 Shandong handling procedures=5.33 |
| Complete dimensions           | X3=X4=X8=X9=1.00                                     |
| Weak dimensions               | X2=0.14; X6=0.49; X7=0.44                            |
| Selected secondary indicators | X7-1=0.89; X7-2=0.06; X5-2=0.46; X6-3=0.00           |

### 3.2 Measurement and Calculation of the PMC Index

To retain the original PMC calculation procedure, secondary indicators were coded using binary assignment. A value of 1 was assigned when the specified institutional item was explicitly present in the policy text; otherwise, a value of 0 was assigned. Primary-variable scores were calculated as the mean of the corresponding secondary indicators, and the overall PMC score was calculated as the sum of the nine primary-variable scores. The original calculation logic is expressed in Equations (1)-(5).

$$X_r \in [0,1] \quad (1)$$

$$X_r = 1 \text{ if the criterion is explicitly present; } X_r = 0 \text{ otherwise} \quad (2)$$

$$X_t = \sum_{j=1}^n X_{t-j} / T(X_{t-j}) \quad (3)$$

$$PMC = \sum_{t=1}^9 X_t \quad (4)$$

$$PMC \text{ Surface Map} = [[X_1, X_2, X_3], [X_4, X_5, X_6], [X_7, X_8, X_9]] \quad (5)$$

Here,  $X_r$  denotes a secondary indicator,  $X_t$  denotes a primary-variable score,  $n$  is the number of secondary indicators under the corresponding primary variable, and  $T(X_{t-j})$  is the number of applicable secondary indicators. The surface map is a visual representation of the nine primary-variable scores and should be interpreted alongside the quantitative results.

### 3.3 PMC Surface Map Analysis

The PMC surface maps supplement the numerical results by visualizing the relative strengths and weaknesses of each primary dimension. Figures 1 present the overall profiles and representative surface maps for Hunan (P4) and Shandong's handling procedures (P26), while Figure 2 reports the mean scores of secondary indicators.

The maps confirm the uneven distribution identified in the dimensional scores. X2 (policy timeliness), X6 (policy guarantee), and X7 (policy publicity) form visible depressions, whereas X8 (policy evaluation) and X9 (policy audience) remain comparatively elevated. Hunan (P4), the highest-scoring policy (PMC=8.08), has a relatively full surface because it combines clear implementation arrangements with stronger support and publicity provisions. In contrast, Shandong's handling procedures (P26; PMC=5.33) show pronounced depressions in X2, X6, and X7, consistent with their lower overall completeness. The secondary-indicator distribution further shows that credit-result application and information disclosure are the most underdeveloped items, while the core content, procedural, rights-and-responsibilities, and audience indicators score 1.00. These visual findings do not constitute a separate test; they illustrate the same coding results reported in Tables 1 and 2.

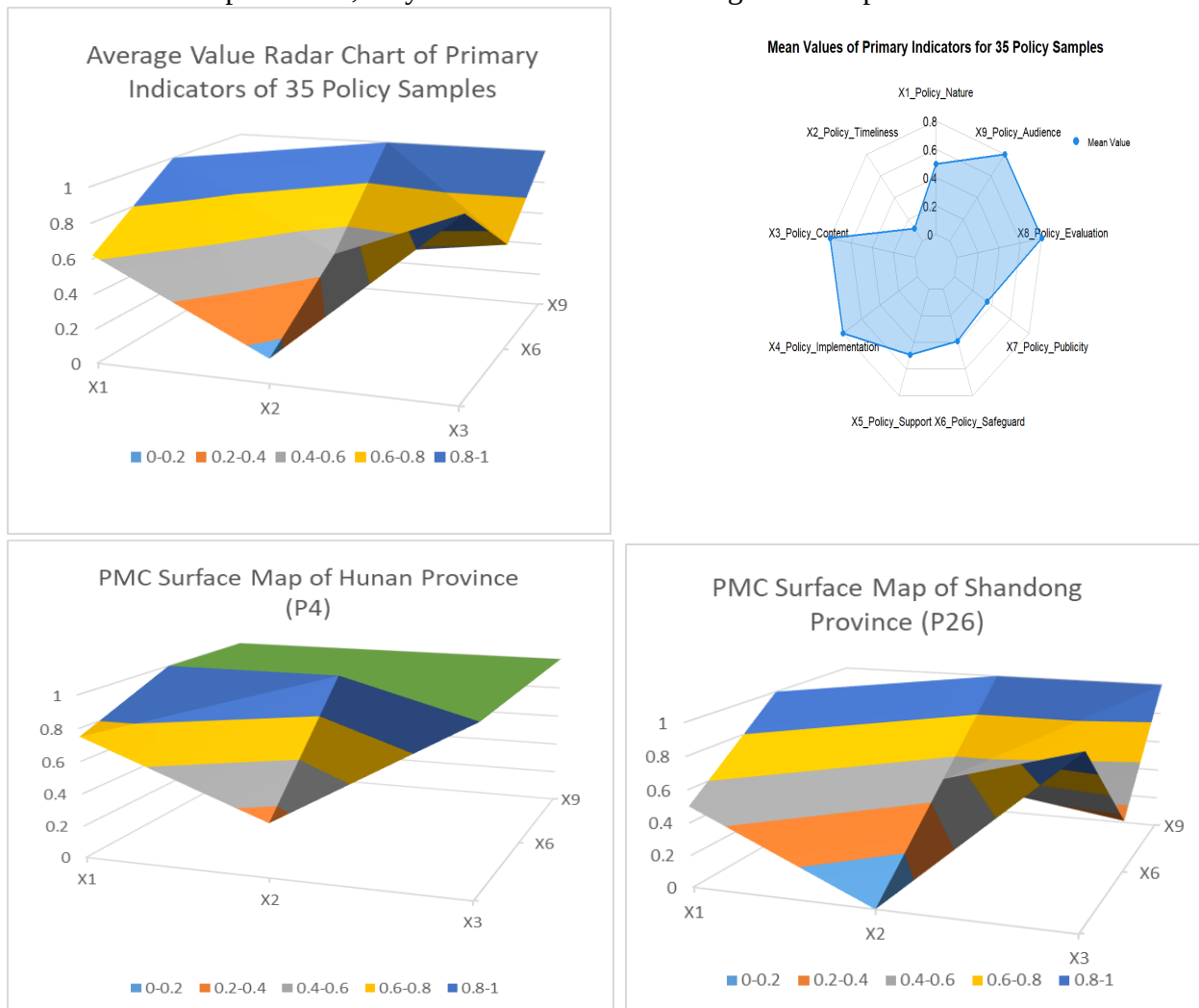


Figure 1. Overall and representative PMC surface profiles.

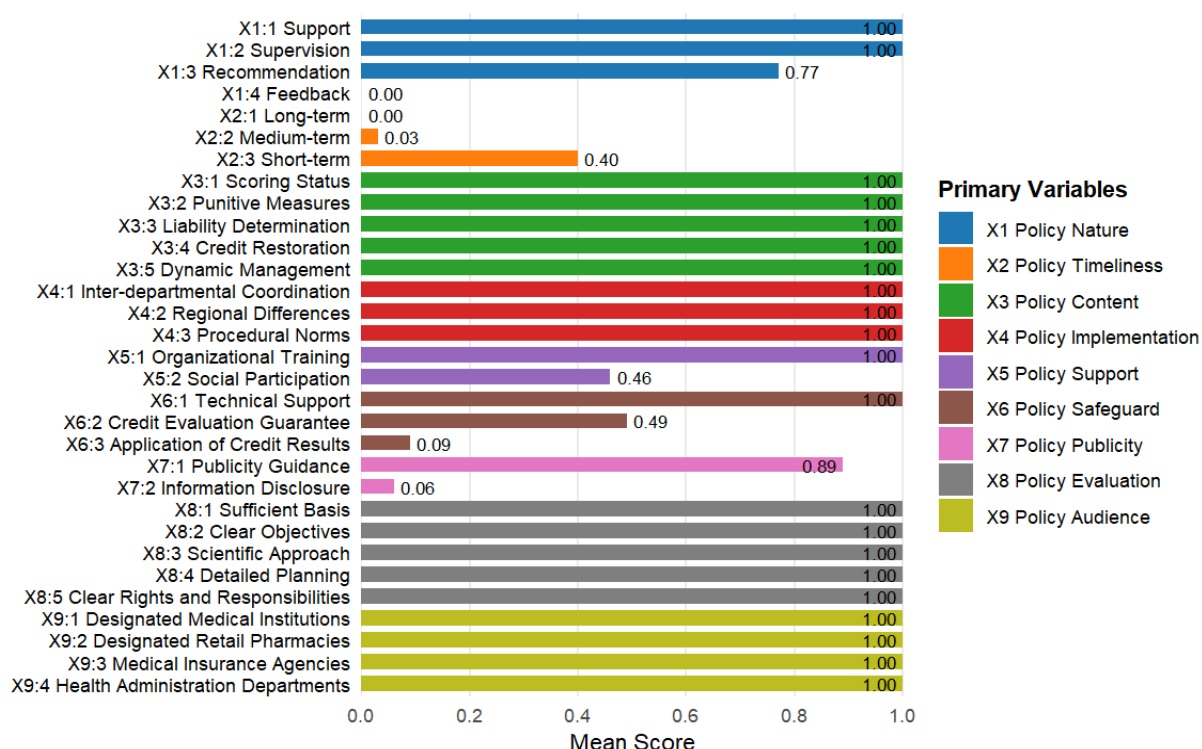


Figure 2. Distribution of Mean Scores for Secondary-indicator

#### 4. Discussion and Policy Implications

The results show that provincial policy texts have successfully translated the basic national design into operational rules. In particular, the consistently high scores for policy content, implementation, evaluation, and audience coverage reflect a common institutional understanding that supervision should be directed not only at institutions but also at the relevant persons within them. The combination of filing, point accumulation, sanctions, restoration, objection, and appeal creates a recognisable closed-loop administrative framework [1,3–5]. The systematic inclusion of medical-insurance agencies, healthcare departments, designated institutions, and retail pharmacies also provides an initial basis for coordinated governance.

Yet the PMC profile reveals a structural imbalance. Strong internal rules do not automatically establish a learning system. First, the low score for timeliness suggests that many documents define what should be done without clearly specifying when the policy should be reviewed, adjusted, or replaced. Public-policy research emphasises that implementation, monitoring, evaluation, and revision are interdependent stages rather than one-off events [16,17]. A formal validity period, scheduled assessment, and revision trigger would make the system more responsive to emerging enforcement patterns and implementation problems.

Second, policy guarantee remains incomplete because information technology is commonly mentioned, while the application of credit results is not. A platform can record qualification status, but its deterrent function will be limited if point results are not connected to practical management scenarios. Credit supervision becomes meaningful when evaluation results affect relevant decisions through clear, lawful, and proportionate linkage arrangements [2,25]. Provincial texts should therefore specify the conditions, scope, responsible agencies, and due-process safeguards for using point-related credit information, including cross-departmental coordination where legally appropriate.

Third, the difference between publicity guidance and information disclosure deserves attention.



The result  $X7-1=0.89$  indicates that many policies recognise the need for interpretation or communication; the result  $X7-2=0.06$  shows that few provide clear disclosure rules. Vague expressions such as disclosure “within a certain range” do not define who receives what information, when, or through which channel. Greater transparency should be designed carefully to balance supervision, privacy, professional rights, and procedural fairness. Public disclosure standards, social-supervisor mechanisms, reporting channels, and feedback arrangements can broaden oversight without treating disclosure as a substitute for formal investigation [1, 23].

Provincial policies should specify an effective period, a routine review interval, and objective triggers for early revision. Medical-insurance authorities and designated institutions should regularly report implementation issues, including point recording, objections, restoration, and system-operation problems. Policies should identify lawful linkage scenarios, data responsibilities, approval procedures, and remedies for individuals affected by credit-related decisions. Policies should distinguish policy interpretation from information disclosure, define disclosure standards, and connect public participation with reporting, social supervision, and feedback mechanisms. Any expansion of data sharing or credit linkage should be accompanied by notification, explanation, objection, and correction procedures, thereby maintaining the legitimacy of individual-oriented supervision.

## 5. Limitations and Conclusion

This study evaluates policy-text completeness rather than implementation outcomes. The coding framework necessarily involves researcher judgement; the X8 evaluation dimension is comparatively basic; prefecture-level supporting policies are not included; and implementation rules and handling procedures may have different functions. Future research should connect text evaluation with administrative data, enforcement records, and stakeholder experience to test whether better-designed texts produce more consistent implementation.

Using 35 provincial policy texts and a nine-dimension PMC framework, this study finds that China’s provincial medical insurance payment qualification system has reached a good level of textual completeness (mean PMC=6.40). The core framework is broadly in place, but policy timeliness, credit-result application, publicity, and social participation remain weaker. The next stage of institutional development should not merely add more rules; it should establish a policy cycle, make appropriate credit linkage operational, and create clearer channels for transparency and feedback. These measures would help convert an individual-accountability framework into a more adaptive and credible long-term supervisory system.

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