HealthPartners

COOK COUNTY HEALTH
& HOSPITALS SYSTEM
CCHHS

Communicating with Boards, Committees, CEO's and Business Leaders - Oh My!

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Learning Objectives

- Understand why effective communication is important
- Learn what the regulators expect
- Gain insight into our reporting approaches and hear from your colleagues through an interactive discussion

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HealthPartners

- HealthPartners is a Minnesota-based integrated health care organization founded in 1957
- Provides health care services and health plan administration
- Over 24,000 employees
- Non-profit & consumer governed

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HealthPartners

- 1.5 million+ medical and dental health plan members nationwide
  - Products: Commercial, Medicare, Medicaid, Self-Insured Administration
- 1 million+ patients
- Includes hospital, primary, specialty care, dental and ancillary care services
- 1,700+ physicians

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Cook County Health & Hospitals System

- Public safety-net health system
- 2 Acute Care Hospitals
- 13 community-based primary care medical home centers
- CORE Center for HIV/AIDS
- Correctional health services at Cook County Jail and the Juvenile Detention Center
- State certified public health department
- CountyCare Medicaid health plan

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CountyCare Health Plan

- Government Medicaid health plan
- 420,000+ members in the State of Illinois in the County of Cook
- Provider owned and led
- Reliant upon partnerships with delegated vendors
- Collaboration with the Medicaid OIG & MFCU

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Why effective communication is important

- Demonstrates engagement of leaders, committees and boards
- Promotes better support and visibility of compliance program activities
- Provides evidence of effective oversight of compliance programs*

  * Don't let this be the primary driver

Tip: understand what information is important to your Boards and Senior Leaders

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What regulators expect

- Medicare
  - Regulatory Guidance
    - Establish and implement effect lines of communication between compliance officer, compliance committee, employees, manager and governing body and the First Tier, Downstream or Related Entity (FDR)
      - 42 C.F.R. § 422.503(b)(4)(vi)(D), § 423.504(b)(4)(vi)(D)

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What regulators expect

- Medicare
  - Includes
    - Multiple Methods to Communicate Expectations
    - Documented Reporting Structure
    - Regular Reports to CEO/President, Governing Body and Compliance Committee
      - Include Program Noncompliance and Fraud, Waste and Abuse
      - Monitoring and Auditing Results
      - Ad Hoc reports if needed
      - FDR Compliance Issues
    - Escalation of Issues
    - Communication with SIU

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What regulators expect

- Medicare
  - Sources
    - 42 C.F.R. § 422.503(b)(4), § 423.504(b)(4)
    - Compliance Program Guidelines
      - Prescription Drug Benefit Manual Chapter 9/Medicare Managed Care Manual Chapter 21
      - Sections 50.1, 50.2, 50.4, 50.6
    - 2017 Medicare Parts C and D Program Audit Protocols – Compliance Program Effectiveness

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What regulators expect

- Commercial
  - Expectations are less clear
    - No audit guides
    - No specific regulatory language
  - Sources
    - 45 C.F.R. § 156....
    - QHP Issuer Compliance Plan and Organization Chart application for certification

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What regulators expect

- Medicaid (HealthPartners)
  - Expectations are less clear
    - No audit guides
    - No specific regulatory language
  - Sources
    - 42 C.F.R. § 438.608(A)(1)
    - State Contracts

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What regulators expect

- Medicaid (Cook County)
  - Crisp for CountyCare; the Department of Healthcare and Family Services (Illinois Medicaid Agency) requires plans to comply with the terms of the contract.
  - HFS OIG expects participation <u>and</u> collaboration ad hoc and during monthly OIG MCO Compliance meetings that includes sharing trends, patterns, and schemes.

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Insight into our reporting approaches

Tip: balance head
(analytical) and heart
(compassion) in reports

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Insight into categories of reporting

Subjects	HealthPartners	CCHHS
Patterns & trends	✔	✔
High risk incidents	✔	✔
Privacy incidents	✔	✔
Government/regulator contact	✔	✔
Regulatory updates	✔	✔
Disciplinary action	✔	✔
Discrimination complaints	✔	

* Not every subject is reported at each meeting

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Other key performance indicators

Metrics
Volumes by category

SIU Activity
✦ Patterns & trends
  ⬥ Providers
  ⬥ Practitioners
✦ Savings & recoupment
✦ Desk audits
✦ Field Audits

Education & training
Staffing
Operational measures ✦ Grievances & appeals ✦ Claims volumes ✦ Membership ✦ CDAG/ODAG TAT

* Be prepared to acknowledge
→ both positive and negative activity;
→ unique/unusual activity;
→ partnerships with other areas within the MCO (or external to the MCO); and
→ implementation of corrective measures.

ALWAYS intersperse direct examples to pique interest, highlight relevancy, and foster engagement

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What about **YOU**?

Don't be afraid to share!

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What about **YOU**?

- Which executives do you provide regular written reports* to?
  - CEO
  - CFO
  - General Counsel
  - All of the above
  - None of the above
- How frequently do you provide written reports * directly to your executives (not during compliance committee meetings)?
  - Bi-weekly
  - Monthly
  - Bi-monthly
  - Quarterly
  - None

* Written Reports
Any form of formal communication (e.g., written, PowerPoint, etc.)

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Let's hear from **YOU**?

- How often to you provide written reports* to your management compliance committee?
  - Monthly
  - Bi-monthly
  - Quarterly
  - Annually
  - None
- How often do you provide written reports* to your Board or a Board Committee
  - Monthly
  - Bi-monthly
  - Quarterly
  - Annually
  - None

* Written Reports
  Any form of formal communication
  (e.g., written, PowerPoint, etc.)

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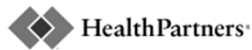## How do **YOU** report compared to your peers?

- Do you include metrics in your written reports?
  - Yes
  - No
  - Don't know
- Do you include any business unit compliance metrics or only compliance department metrics?
  - Only compliance department metrics
  - Compliance department and business unit metrics

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Do **YOU** do the following?

- Do you provide compliance reports to business leaders?
  - Yes
  - No
  - Don't know
- Do you complete and report an annual program effectiveness assessment?
  - Yes
  - No
  - Don't know
- Do you do an annual compliance program report?
  - Yes
  - No
  - Don't know

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