



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*

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



* Don't let this be the primary driver

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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 and 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	
<ul style="list-style-type: none"> + Patterns & trends <ul style="list-style-type: none"> ▲ Providers ▲ Practitioners + Savings & recoupment + Desk audits + Field Audits 	<ul style="list-style-type: none"> * Be prepared to acknowledge <ul style="list-style-type: none"> → 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. <p><u>ALWAYS</u> intersperse direct examples to pique interest, highlight relevancy, and foster engagement</p>
Education & training	
Staffing	
Operational measures	
<ul style="list-style-type: none"> + Grievances & appeals + Claims volumes + Membership + CDAG/ODAG TAT 	

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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 do 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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