Evolution of Monitoring Tools in the Physicians Practice to Identify Risk

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◈ The presentation shared is from presenters experience and relationships across the various organizations.

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Objectives

Tools that monitor risks in the physician practice

Development of computer-based training and education on data analytics

Share lessons learned on our improved experience
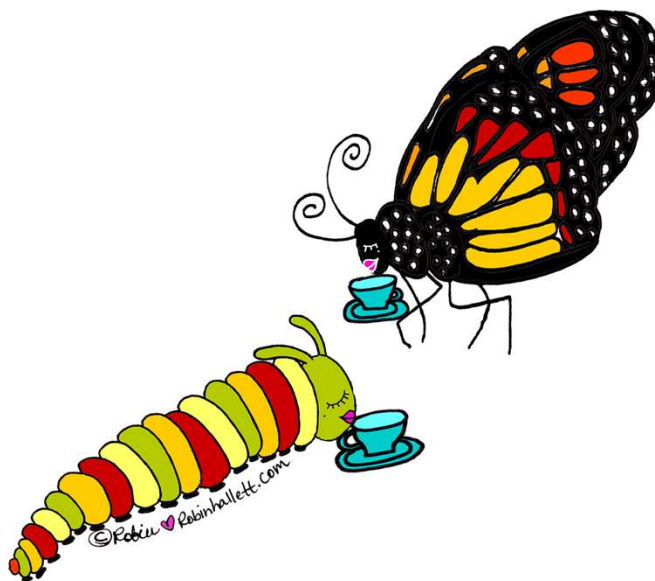
Evolution

Defined as the gradual development of something, especially from a simple to a more complex form.

Where are you in the evolution process?

◈ How many are performing risk assessment specific to your physician practices?

◈ How do you determine the vulnerabilities for your organization?

◈ How can we use information and tools today to assess future potential risk in our organization?
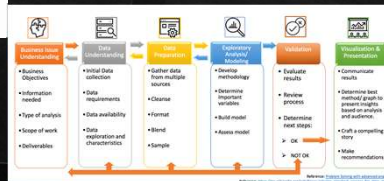
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In the beginning

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Middle Stage

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More sophistication

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Compliance is Everyone's Job

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Potential Risk Areas
What are you measuring?

Revenue Cycle	Coding and Billing	Laboratory	Physician Relationships
Medication Sample	Meaningful Use Attestation	Quality	Privacy and Security
Radiation Safety	Teammate Safety	Real Estate	Licensure and Certifications
Patient Safety	Documentation Excellence	Physician Relationships	Conflict of Interest

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Compliance Cooperative

- Formerly known as the "Matrix"
- Name change as we are evolving our program
- The Compliance Cooperative symbolizes the mutual assistance of our teammates working towards a common goal, who share the benefits of an effective compliance program
- Reflective of the relationship and the body of work being performed

Compliance Officer | Risk Area Owners

Compliance Program

Compliance Liaisons | Practice Regional Reps

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◈ Work with key stakeholders to identify list of compliance high-risk areas.

◈ Create a plan that evaluates whether ongoing monitoring and auditing activities are addressing your highest risk areas identified.

◈ Monitoring plans should detail how identified compliance risks are being tested, reviewed and modified as appropriate.

◈ Determine how risk are calculating the potential damage an identified risk can cause, if not properly mitigated. This should include direct and indirect financial consequences, as well as likelihood of a risk event.

◈ Know the current enforcement priorities (e.g., improper physician arrangements)

◈ Repeat your process to ensure operational and compliance leaders are consistently surveying the environment to assess probability of risk exposure, and impact or damage that may result from risk.

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Our cycle

Risk Identified

Testing – Monitoring and Education Performed

CAP and Audits Performed
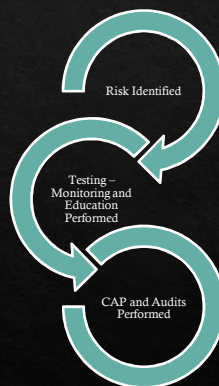
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Sample of conversation template

◈ Monitoring and Evaluation Redesign   Date: _____
◈ Risk Area: _____   Risk Area Owner: _____
◈
◈ Why are we collecting the data?
   ◈ Regulatory requirement – examples: Center of Excellence, CAP, CLIA, Joint Commission, DNV, CoP, State Regulations, Anti-Kickback Statue, Stark Law
   ◈ Previous findings – external/internal – audits and investigations
   ◈ OIG workplan – Office of Inspector General – www.oig.hhs.gov
   ◈ Recent sanctions – In the News - Office of Inspector General – www.oig.hhs.gov, sanctions, penalties, enforcement actions
   ◈ Code of Conduct - organization
   ◈ Policies and Procedures - organization
   ◈ Impact on patient safety/quality of care, risk, employees, financial or reputational harm to organization
◈ Additional websites: www.cms.gov – Medicare and Medicaid
◈ www.oig.hhs.gov – Has a section for compliance guidance as well
◈ State MAC
◈ Review current work plans
◈
◈ Operational/administrative in nature
◈ _____
   _____
◈
◈ Current Audit Plan. – Please review your current work plan prior to discussion
◈ _____
   _____
◈ What keeps you up at night?
   _____
◈ Has any of the directors/leaders identified areas that should be monitored?
   _____
◈
◈ Corporate Compliance discussion elements:
◈
◈ Recent audit findings
◈

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Questions and Logic

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Our new platform

Welcome to **CompliMET Reports**

CompliMET Reports provides a centralized location for you to access Monitoring & Evaluation Tool vizualizations and reports.

This report includes three (3) tabs that can be filtered to your specific needs. The content of each is explained below:

Introductions & Filters:
Provides four (4) different filtering options that will apply to all tabs when selected.
~ Selection of a Parent Entity will show data for all associated entities
  (*this is the suggested starting point*)

~ Selecting one or more Entity will only show data for the selected entity(ies).

~ Selecting one or more Risk Area Topic will show data across all entities for the selected Risk Topic(s).

~ Selecting one or more Period will show data for the selected Period(s) .

Summary:
Provides high-level information, categorized by entity, as a quick snapshot of questionnaire completion progress including correction (if required).

Risk Area Topic Detail:
Provides detailed information at the Risk Topic level, categorized by entity and Compliance Liaison.

Question-level Detail:

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Now What?

◈ Reviewing your data

◈ Did you identify deficiencies or gaps in processes?

◈ Who is responsible for preparing and providing a Corrective Action Plan (CAP)?

◈ Did you identify an isolated or systemic issue?

◈ Implementation of CAP?

◈ Validation testing to ensure your CAP is effective?

◈ Educate and communicate findings

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Key takeaways

◈ Failing to adopt compliance as a process rather than a static form can present the organization with more risk.

◈ Risks identified by the monitoring process need to be reinforced with modifications to your compliance program.

◈ Drive changes with monitoring and evaluation analytics

◈ Determine whether ongoing monitoring and auditing activities has addressed the adequacy of internal controls.

◈ Ensure corrective action plans has been implemented for all deficiencies found within the risk area and the corrective actions are working as intended.

◈ Include results of monitoring and auditing as regular agenda items for operational leaders, key stakeholders and compliance committees.

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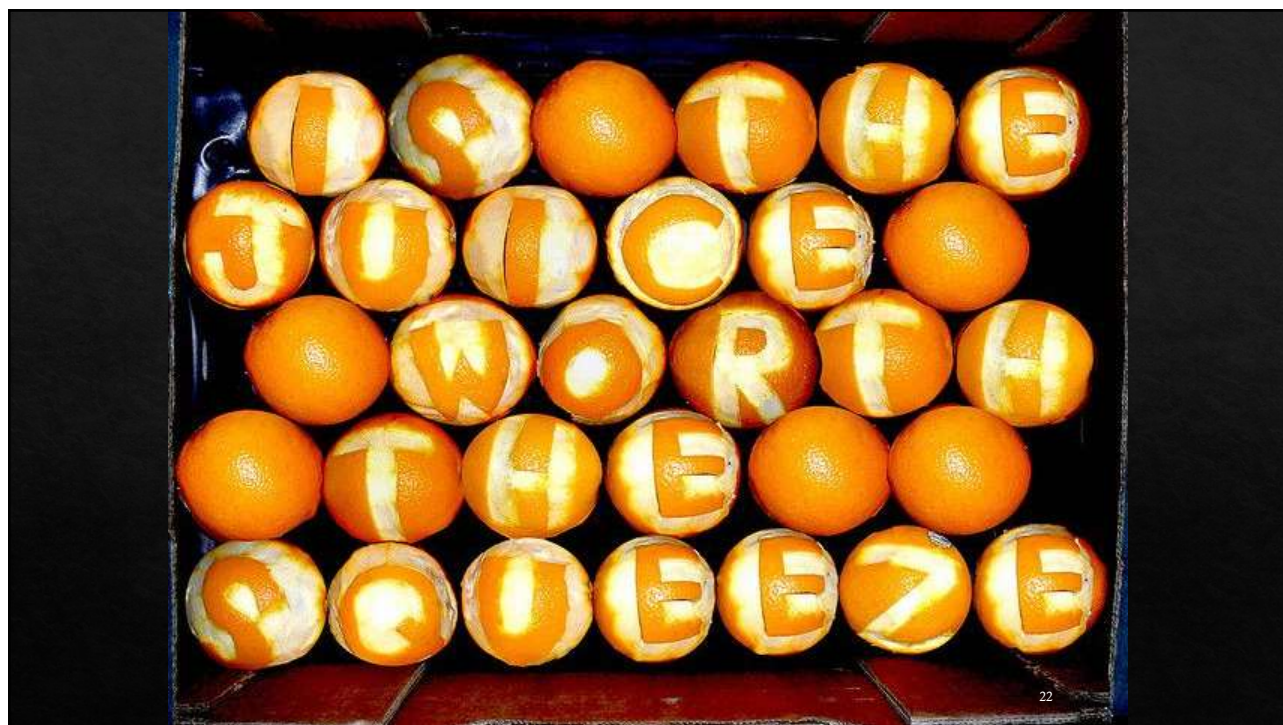
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