

Health Affairs Committee Compliance Update

Jennifer May

Chief Compliance Officer

Aug. 26, 2021



Health Care

CORPORATE INTEGRITY AGREEMENT - Year End

CIA Reporting Period (RP) 5

- **July 1, 2020 – June 30, 2021**
- **CIA Compliance Obligations**
 - **Outlined in Activities Summary and Completion Tracking Document (see handout)**
 - **Outline of materials reviewed during Health Affairs Committee meetings (see handout)**

CORPORATE INTEGRITY AGREEMENT - Year End

Health Affairs Committee – Overview of Activities RP5

- **5 presentations (oral or written) during RP5**
 - **24 total presentations during the term of the CIA**
- **Reports and discussions included the following topics:**
 - **Corporate Integrity Agreement Updates**
 - **Compliance Program Updates**
 - **Data Security Task Force Review**
 - **RP4 Notification and Close-Out**

CORPORATE INTEGRITY AGREEMENT - Year End

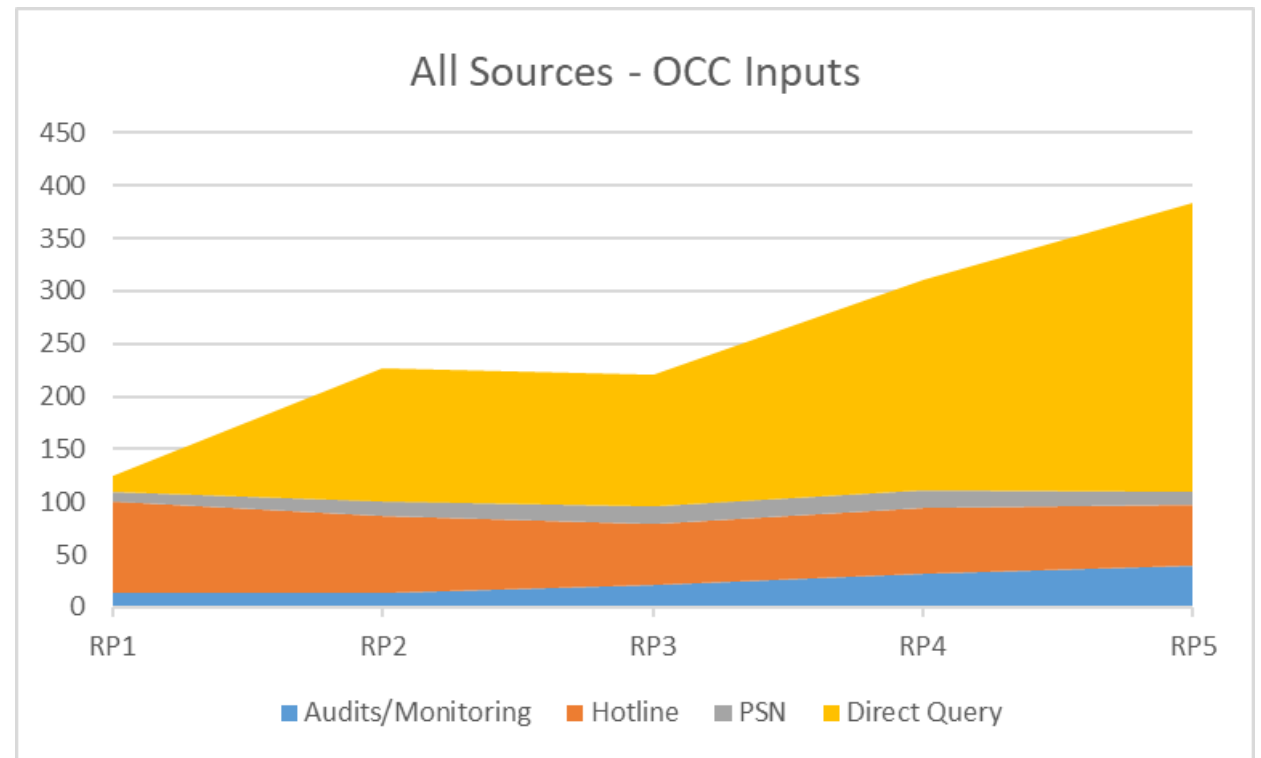
Executive Compliance Committee – Overview of Activities RP5

- **12 meetings (monthly)**
 - **Continued to refine compliance content area data reports**
- **Topic reports and discussions included:**
 - **Corporate Integrity Agreement Updates**
 - **Compliance Program Reports, including metrics**
 - **Risk Assessment and Work Plans**
 - **Other relevant areas of review**

CORPORATE INTEGRITY AGREEMENT - Year End

Direct Reporting and Hotlines in RP5

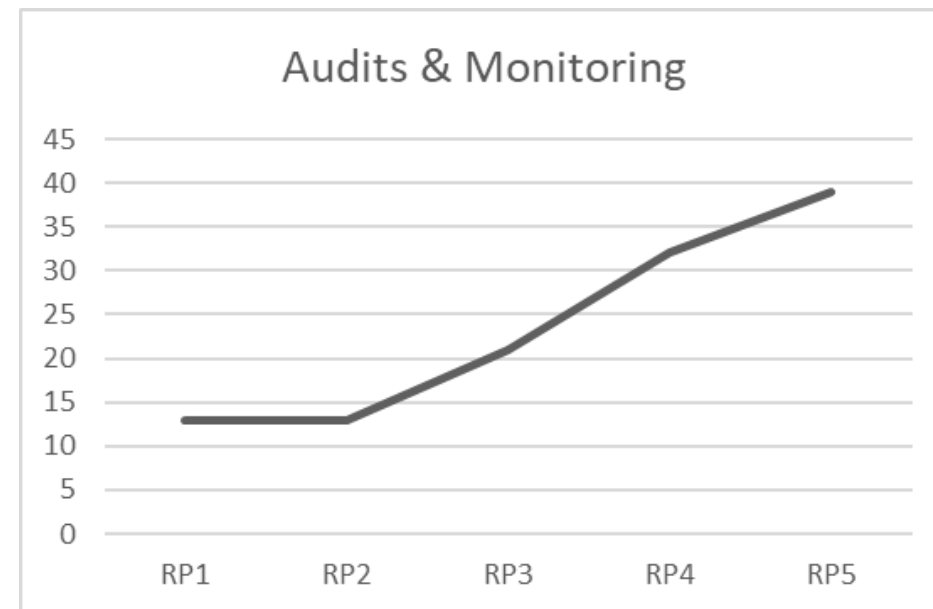
- **Integrity & Accountability Hotline: 58**
- **Patient Safety Network: 12**
- **Direct Inquires: 274**



CORPORATE INTEGRITY AGREEMENT - Year End

RP5 auditing and monitoring activity

- **26 audits/targeted reviews**
- **13 on-going monitoring programs**



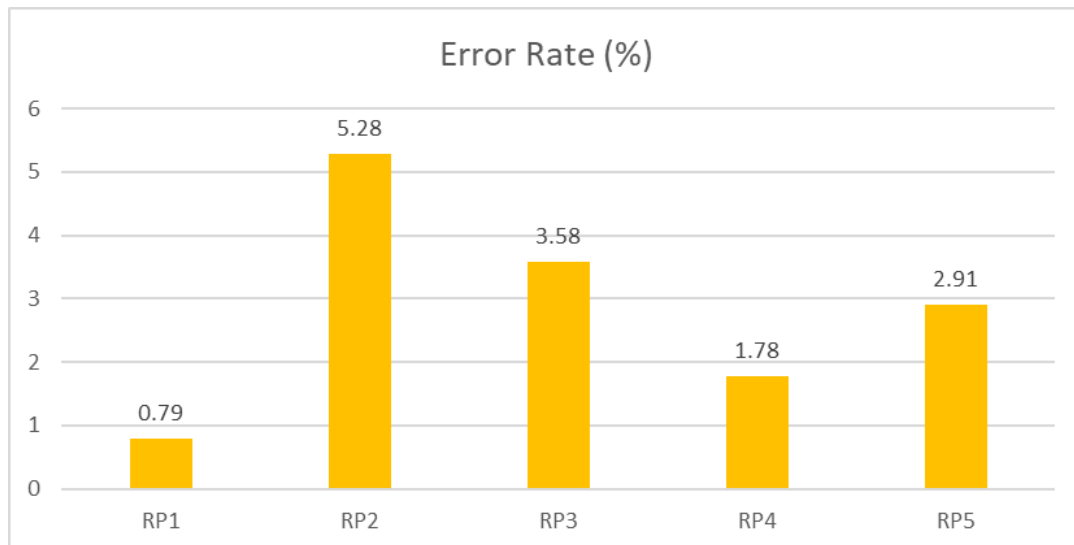
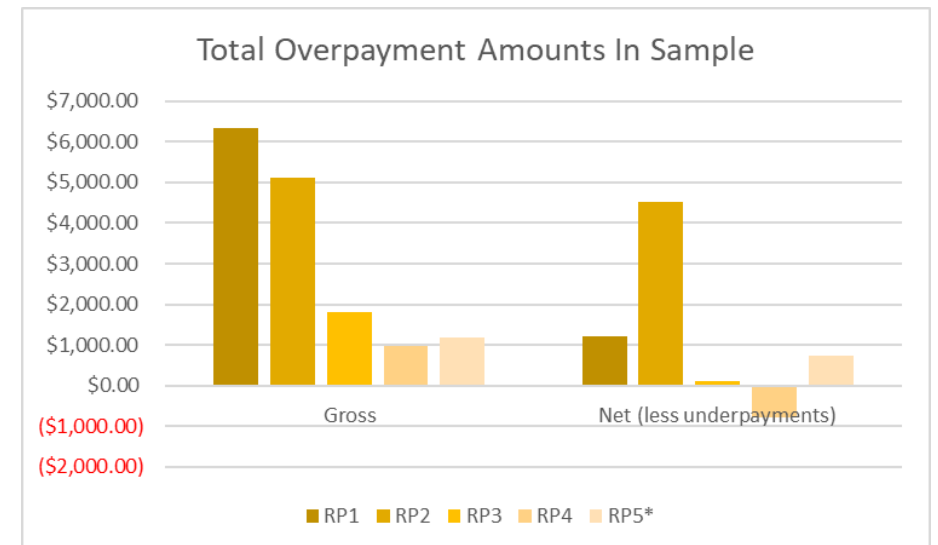
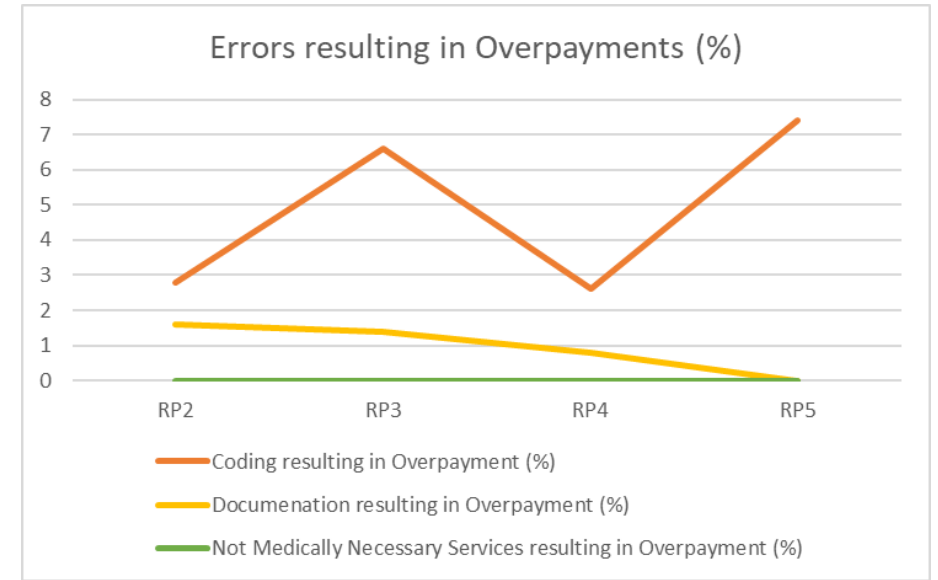
- **Additionally, the office completed 8 investigations and 31 projects**

CORPORATE INTEGRITY AGREEMENT - Year End

Annual Claims Review (*not final; RP5 data in charts is preliminary*)

External auditor reviews 500 paid claims made to federal health care programs

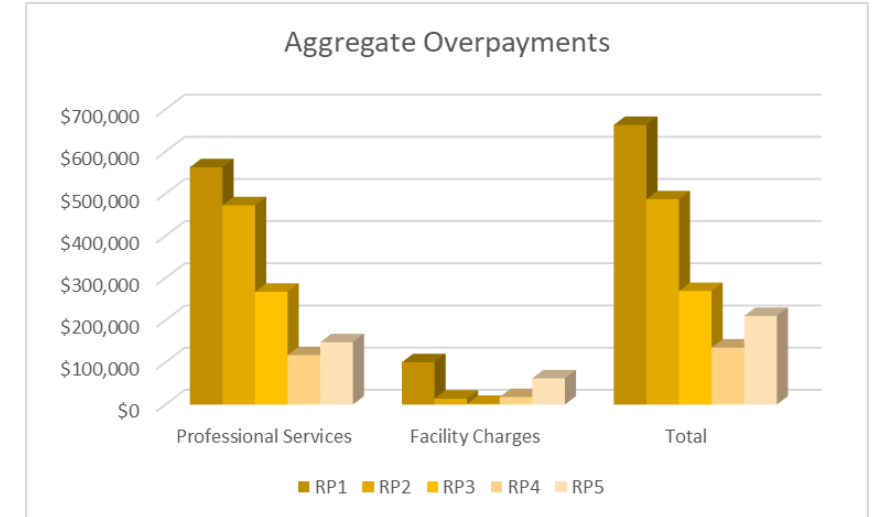
Overpayments (*MU received more reimbursement than allowed under the payment programs*) are the primary issue for which the auditor reviews



CORPORATE INTEGRITY AGREEMENT - Year End

Other Items Included in the RP5 Annual Report

- **Aggregate Overpayments**
 - **Identified and addressed internally**
- **Management Certifications Complete**
 - **Certifications of compliance must be made annually by management level personnel identified in the CIA**
- **Exclusion Screening Completed Monthly**
 - **no confirmed matches**



CORPORATE INTEGRITY AGREEMENT - Year End

Other Items Included in the RP5 Annual Report

- **Policy Reviews Completed**
- **Training and Education Complete**
 - **100% of all Covered Persons completed mandatory modules**
- **Risk Assessment Process Complete**
 - **ECC reviewed and approved the FY22 Compliance Work Plan**

CORPORATE INTEGRITY AGREEMENT - Year End

Other compliance-related activities in RP5

- **679 HIPAA investigations**
 - **119 reportable incidents**
- **Data Security Task Force**
- **Ongoing COVID-19 support activities**

CORPORATE INTEGRITY AGREEMENT - Year End

Primary Conclusions

- **Strong levels of trust and confidence by our staff to reach out with questions and concerns**
- **Excellent levels of clinical documentation by our providers demonstrating the commitment to providing medically necessary care**
- **Tremendous pride in our growth and commitment to integrity and continuous improvement**

CORPORATE INTEGRITY AGREEMENT - Year End

CIA Resolution Language

“The Health Affairs Committee of the Board of Curators of the University of Missouri has made a reasonable inquiry into the operations of the Compliance Program of MU Health (sometimes referred to as University of Missouri Health System or UMHS) including the performance of the Chief Compliance Officer and the Compliance Committee. Based on its inquiry and review, the Health Affairs Committee has concluded that, to the best of its knowledge, UMHS has implemented an effective Compliance Program to meet Federal health care program requirements and the obligations of the Corporate Integrity Agreement.”