

University of Missouri Health System Corporate Integrity Agreement  
Activities Summary and Completion Tracking - Reporting Period 3

CIA Section #	CIA Section Title / Content Summary	Action Item	Assigned To	Completed
III.A.1	Chief Compliance Officer	quarterly reports to BOC	CCO / BOC Office	30-Jun-2019
III.A.2	Compliance Committee	quarterly meetings of ECC	CCO	30-Jun-2019
III.A.3	BOC Compliance Obligations	description of materials reviewed	BOC (CCO)	30-Jun-2019
III.A.3	BOC Compliance Obligations	resolution	BOC (CCO)	29-Aug-2019
III.A.4	Management Certification	annual certification of compliance	CCO	30-Jun-2019
III.B.1	Code of Conduct	annual review of COC	CCO	30-Jun-2019
III.B.1	Code of Conduct	annual distribution to all Covered Persons	CCO	30-Jun-2019
III.B.2	Policies & Procedures	annual review of all compliance policies	CCO	30-Jun-2019
III.C.1	Training Plan	furnish training to all Covered Persons	CCO	30-Jun-2019
III.C.3	Certification	Covered Persons certification of training	CCO	30-Jun-2019
III.C.5	Update of Training Plan	annual review of training plan	CCO	30-Jun-2019
III.C.5	Update of Training Plan	changes to training plan ( <i>requires OIG approval</i> )	CCO	if necessary
Appendix B	Claims Review	annual review	IRO	1-Jul-2019
Appendix B	A.1.c. Population	furnish patient census and payor mix to OIG	CCO / UP / Finance	22-Mar-2019
Appendix B	A.1.c. Population	proposed subset of claims for review (not req'd)	CCO / Finance	22-Mar-2019
Appendix B	A.3 Repayment of Overpayments	UMHS shall repay IRO-identified overpayments	Finance	if necessary
Appendix B	B. Claims Review Report	IRO prepares / CCO filed with Annual Report	IRO / CCO	29-Aug-2019
III.E	Risk Assessment and Internal Review	annual risk assessment conducted	CCO/ Internal Audit	30-Jun-2019
III.F	Disclosure Program	maintain disclosure log / record of disclosures	CCO	30-Jun-2019
III.G.2.b	Screening Requirements	screen current Covered Persons - annually - SAM	CCO	30-Jun-2019
III.G.2.b	Screening Requirements	screen current Covered Persons - montly - LEIE	CCO	30-Jun-2019
III.J.2	Reporting of Reportable Event	notification to OIG of reportable event	CCO / CPO	as necessary
V.B	Annual Reports	submission of annual report	CCO	29-Aug-2019
V.C.1	Certifying Employees	management certifications in annual report	CCO	29-Aug-2019
V.C.2	CCO and EVC-HA	certification by CCO and EVC-HA in annual report	CCO / EVC-HA	29-Aug-2019

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<b>COMPLETED DURING REPORTING PERIOD 1</b>				
III.A.2	Compliance Committee	appmt of Committee (ECC) / CCO chair	CCO	Completed RP1
III.A.4	Management Certification	written process for certifications	CCO	Completed RP1
III.B.1	Code of Conduct	implementation of code of conduct	CCO	Completed RP1
III.B.1	Code of Conduct	performance eval process includes Code of Conduct	HR	Completed RP1
III.B.2	Policies & Procedures	implementation of compliance policies	CCO	Completed RP1
III.B.2	Policies & Procedures	performance eval process includes policies	HR	Completed RP1
III.B.2	Policies & Procedures	(see a. - h. for policy topics)	CCO	Completed RP1
III.B.2	Policies & Procedures	policies available to all Covered Persons	CCO	Completed RP1
III.C.1	Training Plan	develop written training plan	CCO	Completed RP1
III.C.2	BOC Training	provide 2-hour training to BOC (certifications signed)	CCO / BOC Office	Completed RP1
III.D.1.a	Engagement of IRO	engage IRO, as required in Appendix A	Finance	Completed RP1
III.G.2.b	Screening Requirements	screen current CPs - initial	CCO	Completed RP1
III.G.2.b	Screening Requirements	policy for Covered Persons to disclose exclusion	CCO	Completed RP1
III.I.2	Overpayments Policies and Procedures	develop and implement written policy	Finance	Completed RP1
V.A	Implementation Report	submission of implementation report	CCO	Completed RP1
V.C.3	CFO of UMHS	first annual report only; cert of settlement agmt	CFO	Completed RP1
<b>COMPLETED PRIOR TO EFFECTIVE DATE</b>				
III.A.1	Chief Compliance Officer	appmt of CCO/job duties		Completed Prior
III.E	Risk Assessment and Internal Review	annual risk assessment process established	CCO / Internal Audit	Completed Prior
III.F	Disclosure Program	establish disclosure program (hotline)	CCO / Internal Audit	Completed Prior
III.G.2.a	Screening Requirements	screening process for prospective Covered Persons	HR	Completed Prior