

Memo

To: Board of Curators – Health Affairs Committee
University of Missouri System

From: Jennifer P. May, J.D.
Chief Compliance Officer
MU Health

Date: June 10, 2020

Re: Compliance Program Update

- A. Executive Compliance Committee – Overview of Activities FY20 YTD
 - a. General
 - i. 9 meetings (monthly except November; planned for June)
 - ii. Continued to refine compliance content area data reports
 - b. Topic Reports
 - i. Corporate Integrity Agreement Updates
 - 1. Obligations Review and Status Update (monthly)
 - 2. Review of Annual Report (Aug, Sept)
 - 3. Claims Review (Aug, Sept, Mar)
 - 4. Training Plan review (Mar)
 - ii. Compliance Reports
 - 1. General Program (compliance, privacy, information security) updates and program reviews (monthly)
 - 2. Privacy Incident Update (Aug, Sept, Dec, May)
 - iii. Risk Assessment and Work Plans
 - 1. Internal Audit update (Oct, Mar)
 - 2. Risk Assessment Process (May)
 - 3. FY20 Compliance Work Plan update (monthly)
 - 4. FY21 proposed work plan (scheduled for June)
 - iv. Other
 - 1. Board Agenda Review (Sept, Feb)
 - 2. Coding Compliance Plan (Oct)
 - 3. Healthicity (compliance software) Implementation (Dec)
 - 4. MU Health Code of Conduct (Dec, scheduled for June)
 - 5. Regulatory Affairs Update (Jan, Mar)

- B. Ethics and Compliance Hotline
 - a. FY19 Year End: 58 cases
 - b. FY20 YTD: 49 cases

- C. Compliance Program Update
 - a. Training and Education
 - i. As of May 28, 88% of current employees completed training modules
 - 1. Deadline: May 31, 2020 (extended due to COVID-19)
 - a. All Covered Persons learning set – 91%
 - b. Billers/Coders learning set – 99%
 - c. Providers learning set – 90%
 - 2. rolling process with HR to identify new employees
 - 3. for the past three years, 100% completion has been achieved by the end of the reporting period (June 30)
 - ii. Orientation for all new employees on the Code of Conduct (bi-weekly)
 - iii. Live training session to educate leaders (managers and above) on the Code of Conduct (Sept)
 - b. Management Certifications
 - i. Annually, certifications of compliance must be made by management level personnel, as identified by title in the CIA
 - ii. Process will be completed by June 30, 2020
 - c. Exclusion Screening
 - i. Monthly checks conducted by a vendor
 - ii. As of May 28, three confirmed matches have occurred during FY20; all cases closed with appropriate action
 - iii. Expanded scope of responsibility to include UM System and SOM vendor files
 - d. Policy Updates scheduled for completion by June 30, 2020
 - e. Monitoring and auditing projects for FY20, both scheduled and added to the work plans, as of May 28:
 - i. 47 audits/investigations, and 9 targeted probe reviews
 - ii. responded to 97 inquires related to topics such as coding, billing, CMS guidelines and physician oversight obligations
 - iii. 8 on-going monitoring programs
 - iv. 385 HIPAA reports and investigations, with 63 reportable incidents
 - v. cybersecurity penetration testing and results assessment
 - vi. collaboration with campus information technology and Tiger Institute on assessment and implementation of Microsoft Office 365

- vii. various support activities related to COVID-19, including telehealth rule implementation, patient privacy chart audits, and information security support for remote workforce expansion
- f. Risk Assessment and Compliance Plan for FY21
 - i. Truncated risk assessment due to COVID-19
 - ii. Proposed Compliance Plan for FY21 in development and will be presented to ECC in June 2020

Memo

To: Board of Curators – Health Affairs Committee
University of Missouri System

From: Jennifer P. May, JD, CHC
MU Health Chief Compliance Officer

Date: June 10, 2020

Re: Summary of Materials Reviewed YTD in Oversight of MU Health Compliance Program during Fiscal Year 2020 / CIA Reporting Period 4

In addition to discussions which occurred during both open and closed sessions of the Board meetings, below is a summary of the topic updates and materials reviewed by the Health Affairs Committee as of the date of this memo and during the fourth Reporting Period under the Corporate Integrity Agreement and in support of its oversight of the MU Health Compliance Program.

September 18, 2019

- CIA Reporting Period 3 Completion Update
- Annual Report elements and highlights
- Resolution request and approval

November 13, 2019

- CIA Reporting Period 4 Update
- Corporate Compliance Structure Review
- Compliance Program Update
- Privacy Program Update
- Information Security Program Update

January 30, 2020

- CIA Reporting Period 4 Update
- Compliance Program Update
- Information Security Program Update
- Privacy Program Update
- Review of Organized Health Care Arrangement structure and operations

April 2, 2020

- CIA Reporting Period 4 Update
- Compliance Program Update
- COVID-19 Compliance Report
- Work Plan and Volume Trends for Compliance and Privacy programs

University of Missouri Health System Corporate Integrity Agreement
Activities Summary and Completion Tracking - Reporting Period 4

CIA Section #	CIA Section Title / Content Summary	Action Item	Assigned To	Completed
III.A.1	Chief Compliance Officer	quarterly reports to BOC	CCO / BOC HAC	30-Jun-2020
III.A.2	Compliance Committee	quarterly meetings of ECC	CCO	30-Jun-2020
III.A.3	BOC Compliance Obligations	description of materials reviewed	BOC (CCO)	1-Oct-2020
III.A.3	BOC Compliance Obligations	resolution	BOC (CCO)	1-Oct-2020
III.A.4	Management Certification	annual certification of compliance	CCO	30-Jun-2020
III.B.1	Code of Conduct	annual review of COC	CCO	30-Jun-2020
III.B.1	Code of Conduct	annual distribution to all Covered Persons	CCO	30-Jun-2020
III.B.2	Policies & Procedures	annual review of all compliance policies	CCO	30-Jun-2020
III.C.1	Training Plan	furnish training to all Covered Persons	CCO	30-Jun-2020
III.C.3	Certification	Covered Persons certification of training	CCO	30-Jun-2020
III.C.5	Update of Training Plan	annual review of training plan	CCO	23-Mar-2020
III.C.5	Update of Training Plan	changes to training plan (<i>requires OIG approval</i>)	CCO	26-Mar-2020
Appendix B	Claims Review	annual review	IRO	1-Oct-2020
Appendix B	A.1.c. Population	furnish patient census and payor mix to OIG	CCO/ UP	30-Mar-2020
Appendix B	A.1.c. Population	proposed subset of claims for review (not req'd)	CCO / UP	30-Mar-2020
Appendix B	A.3 Repayment of Overpayments	UMHS shall repay IRO-identified overpayments	UP	if necessary
Appendix B	B. Claims Review Report	IRO prepares / CCO filed with Annual Report	IRO / CCO	1-Oct-2020
III.E	Risk Assessment and Internal Review	annual risk assessment conducted	CCO/ Internal Audit	30-Jun-2020
III.F	Disclosure Program	maintain disclosure log / record of disclosures	CCO	30-Jun-2020
III.G.2.b	Screening Requirements	screen current Covered Persons - annually - SAM	CCO	30-Jun-2020
III.G.2.b	Screening Requirements	screen current Covered Persons - montly - LEIE	CCO	30-Jun-2020
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	1-Oct-2020
V.C.1	Certifying Employees	management certifications in annual report	CCO	1-Oct-2020
V.C.2	CCO and EVC-HA	certification by CCO and EVC-HA in annual report	CCO / EVC-HA	1-Oct-2020

University of Missouri Health System Corporate Integrity Agreement
Activities Summary and Completion Tracking - Reporting Period 4

COMPLETED DURING REPORTING PERIOD 1				
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
COMPLETED PRIOR TO EFFECTIVE DATE				
III.A.1	Chief Compliance Officer	appmt of CCO/job duties	EVC-HA	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