

# MU Health Care Compliance Report

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# Corporate Integrity Agreement Update

# CIA Reporting Period 3

- July 1, 2018 – June 30, 2019
- CIA Compliance Obligations
  - Outlined in Activities Summary and Completion Tracking Document (see handout)
  - Outline of materials reviewed during Board and/or Health Affairs Committee meetings (see handout)
  - Most items will be completed on or before June 30
  - Claims Review process will start after the close of the Reporting Period; will end prior to submission of Annual Report

# Compliance Program Update: Year End

- Executive Compliance Committee (ECC) – Overview of Activities FY19 YTD
  - General
    - 9 meetings (monthly except November; planned for May and June)
    - Established regular data reports from compliance units
  - Topic Reports included
    - Corporate Integrity Agreement Updates
    - Compliance Reports
    - Risk Assessment and Work Plans

# Compliance Program Update: Year End

- Ethics and Compliance Hotline
  - FY18 Year End: 66 cases
  - FY19 Year to Date: 35
- Transition to single hotline occurred Aug 2018
  - Integrated both the Ethics and Compliance Hotline and Bias Hotline to eliminate confusion and provide a single portal for individuals to report and for the organization to manage cases

# Compliance Program Update: Year End

- Training and Education
  - CIA-mandated training transitioned to internal learning management software platform, Saba
  - As of May 16, 99% of current employees completed training modules
  - Continued live training session to educate leaders (managers and above) on the Code of Conduct
- Management Certifications
  - Annually, certifications of compliance must be made by management level personnel, as identified in the CIA
  - Process will be completed by June 30, 2019

# Compliance Program Update: Year End

- **Exclusion Screening**
  - Monthly checks conducted
  - As of May 16, investigating one potential finding Risk
- **Assessment and Compliance Plan for FY20**
  - Completed risk assessment in collaboration with UM System Internal Audit Services
  - Interviewed stakeholders from hospital and academic units

# Compliance Program Update: Year End

- Monitoring and auditing projects scheduled for FY19 will be completed on time. This included:
  - 8 coding accuracy audits and 15 targeted probe reviews
  - A review of the 340B Drug Pricing Program
  - 8 on-going monitoring programs
  - Other projects covering various topics, including Fellows Billing; Extended Women's Health Services; Therapy; Software Edits; Orders; Resident Oversight; Pediatric Echocardiogram; Extended Recovery; Telehealth; Transcranial Magnetic Stimulation; Allergy Billing



# 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 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.”*