



Health Care

Compliance Program Update

Health Affairs Committee | March 21, 2018

CIA Reporting Period 1: Follow-Up

- **OIG Comments on Annual Report**
 - Received 1/31/18
 - Requested additional information on one audit, clarification on hotline process and additional metrics from IRO
 - Submitted response 2/14/18

CIA Reporting Period 2

- July 1, 2017 – June 30, 2018
- Health Affairs Committee – CIA Compliance Obligations
 - Quarterly meetings to review and oversee UMHS’s compliance program and performance of the Chief Compliance Officer and the Compliance Committee
 - Submission (*in Annual Report*) of a description of documents and other materials reviewed during the Reporting Period in its oversight of the Compliance Program
 - Adoption of annual resolution summarizing its review and oversight of UMHS’s compliance with Federal Health Care programs and CIA obligations

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.”*
 - Signed July 28, 2017 for Reporting Period 1

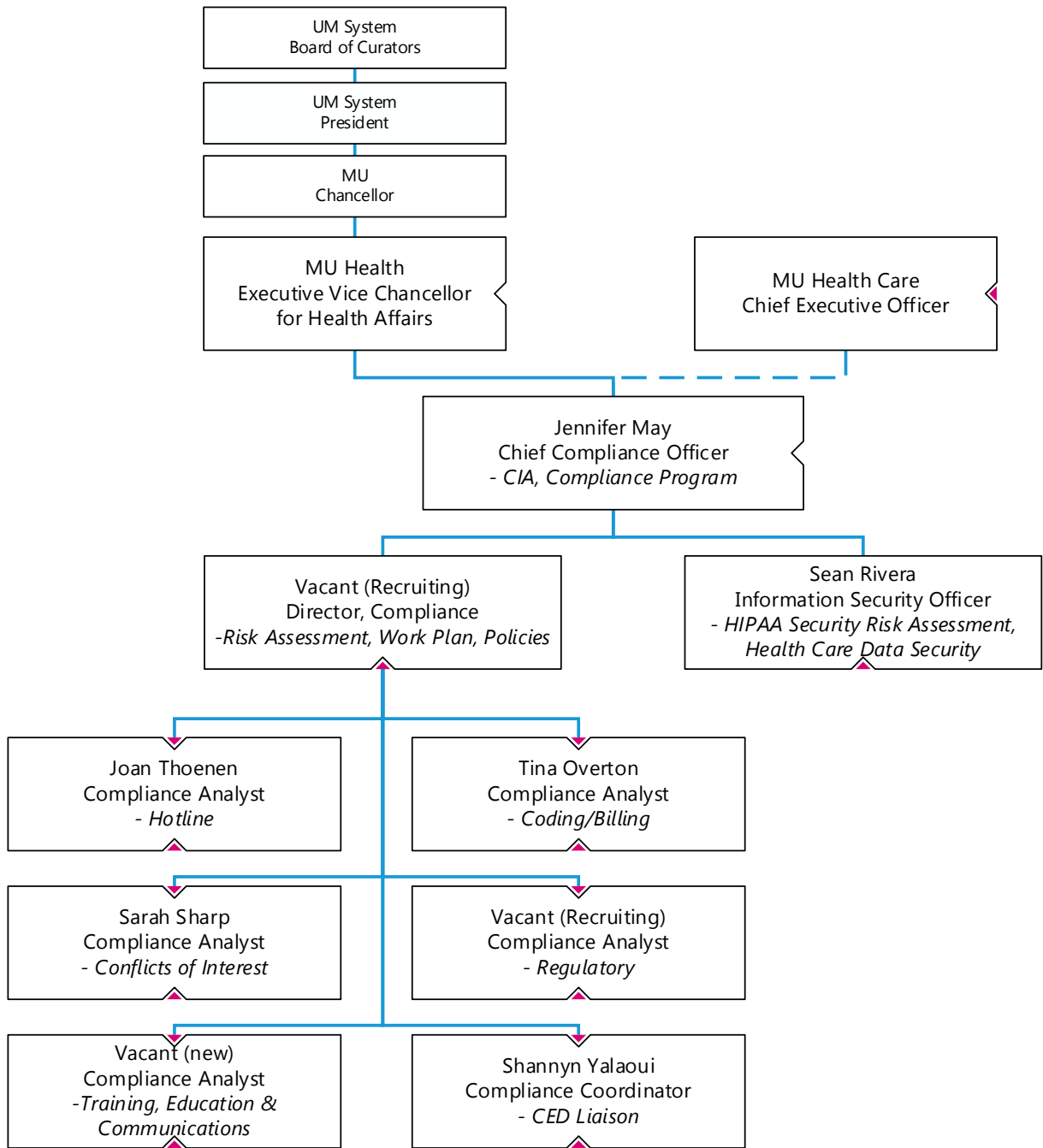
Elements of the MU Health Compliance Program

Organized in accordance with the seven elements outlined by the DHHS OIG for effective compliance programs

1. Designate a compliance officer and compliance committees
2. Develop written compliance plans, policies, and standards of conduct
- 3. Monitor and audit compliance risk areas**
4. Develop open lines of communication
5. Implement education and training
6. Enforce disciplinary standards
7. Respond to detected deficiencies

COMPLIANCE PROGRAM UPDATE

- Monitoring and auditing provides MU Health with assurance that it is operating in accordance with rules, regulations and policy.
- The OCC works in conjunction with UM System Internal Audit and MU Health leaders to develop an annual risk assessment. Work plans are informed by the risks identified and covers areas such as:
 - Coding and billing
 - Regulatory obligations
 - Accreditation standards



COMPLIANCE PROGRAM UPDATE

- Permanent CCO named
- Annual review of Policies
- Annual Mandatory Training due 5/31/18
- Claims Review recommendation due 4/1/18
- FY19 risk assessment and work plan development
- Disclosure Program
 - CIA Reportable Events: FYTD - 5
- Exclusion Screening Vendor