

Health Affairs Committee Compliance Update September 10, 2018

CORPORATE INGEGRITY AGREEMENT UPDATE

Reporting Period 2 Complete

- Annual Report and Claims Review filed with the OIG Monitor on Tuesday, August 28, 2018
 - Receipt confirmed on 8/29/18
 - Feedback pending

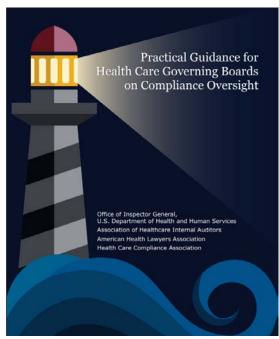
CORPORATE INGEGRITY AGREEMENT UPDATE

CIA Reporting Period 3

- July 1, 2018 June 30, 2019
- CIA Compliance Obligations
 - Current activities include:
 - Reviewing annual report for areas to improve in RP3
 - Reviewing the training plan
 - Reviewing policies
 - Claims Review facility list and selection will occur in Spring 2019

- OIG Compliance Resource Portal
 - https://oig.hhs.gov/compliance/compliance-resource-portal/
 - Specific section to support healthcare boards
 - Papers, checklists and videos are included





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
- 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 – Year End

- Policies and Procedures
 - Utilize common platform, Navex, to develop and distribute across MU Health
 - Annually review all compliance policies for updates
- Training and Education
 - CIA-mandated training transitioned to internal learning management software platform, Saba
 - Implemented live training session to educate leaders on the Code of Conduct
 - Looking to expand training through other media (e.g. newsletters, website, in-service)

- Office of Corporate Compliance Staffing Updates
 - Tina Adams-Salter, System Privacy Officer
 - Provides oversight and direction of the MU Health privacy program; HIPAA rules compliance and enforcement; Privacy education and training; Assess privacy risks and coordinate organization-wide protections for our patients' protected health information
 - Katie Tegerdine, Director of Compliance
 - Provides oversight and direction of MU Health monitoring, auditing, and review programs; Curation of compliance policies and procedures; Develop and coordinate distribution of compliance education; support Risk Assessment process and Work Plan development

