Corporate Integrity Agreement – Year End
Jennifer May, Chief Compliance Officer
CIA Reporting Period (RP) 4

• July 1, 2019 – June 30, 2020
• CIA Compliance Obligations
  o Outlined in Activities Summary and Completion Tracking Document (see handout)
  o Most items completed on or before June 30
  o Outline of materials reviewed during Health Affairs Committee meetings (see handout)
  o Claims Review completed and final report will be included with Annual Report
• **Executive Compliance Committee (ECC) – Overview of Activities RP4**
  - **General**
    - 10 meetings (monthly except July and November)
    - Continued to refine compliance content area data reports
  • **Topic Reports included**
    - Corporate Integrity Agreement Updates
    - Compliance Reports
    - Risk Assessment and Work Plans
    - Other relevant areas of review
• Direct Reporting and Hotlines
  o Integrity & Accountability Hotline: 62
  o Patient Safety Network: 17
  o Direct Inquires: 199

• Training and Education
  o 100% completed training modules
  o Continued live training session to educate leaders (managers and above) on the Code of Conduct
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• Management Certifications
  o Certifications of compliance must be made annually by management level personnel identified in the CIA
  o All certifications complete

• Exclusion Screening
  o Monthly checks conducted; three confirmed matches were closed with appropriate action

• Policy Reviews
  o Completed
• **RP4 monitoring and auditing projects included:**
  - 18 audits and 6 targeted reviews
  - 8 ongoing monitoring programs
  - Additionally, OCC conducted 28 investigations

• **Risk Assessment and Compliance Plan for FY21**
  - Truncated risk assessment due to COVID-19
  - ECC reviewed the FY21 Compliance Work Plan
• Other compliance-related activities in RP4:
  o 1,131 HIPAA investigations; 189 reportable incidents
  o Cybersecurity penetration testing and results assessment
  o Expanded email phishing testing
  o COVID-19 support activities, including telehealth rule implementation, privacy chart audits and information security support for remote workforce expansion
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 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.”
Questions?