Compliance Officer's Role in Regulatory Readiness

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Current Environment

- Survey Readiness

- Corporate Compliance

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Survey Readiness

- CMS – MCoPs

- JCAHO

- HFAP / AOA

- OSHA

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Additional Survey Activity

- Generated by:

  - ◆ Patient Complaints

  - ◆ EMTALA

  - ◆ OSHA

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Corporate Compliance

- Employee education
- HIPAA
- Marketing
- Coding / Billing
- Travel / Gifts
- Physician Relationships
- SOX
- Fraud and abuse

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Quality Initiatives

- Pay for Performance (P4P)

- Quality Reporting

- Patient Safety / Error Reporting

Transformation

- Survey Readiness

- Corporate Compliance

- **QUALITY / SAFETY**

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So…..the Compliance Officer is a conduit of:

- Accrediting / Certifying Bodies Regulations & Standards

- Compliance requirements

- Quality and Safety Initiatives

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How to have an 8 to 5 job in today's regulatory environment.

CO/QI Roles

- Limited resources

- One person can't do it all

- CO must adopt oversight role

- Work smarter, not harder

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Evaluate Key Roles

- Compliance Officer
- PI Director
- JCAHO/HFAP/CMS, etc. Prep
- Patient Safety Officer
- HIPAA Project Manager
- Privacy Officer
- Security Officer
- Risk Manager
- Medical Staff Credentialing
- Infection Control
- What else do you do?!?!?

Evaluate Meetings

- Medical Staff
- Patient Care
- OB/GYN
- ER
- Infection Control
- Pharmacy & Therapeutics
- Surgical Review
- Credentials
- Safety

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Evaluate Meetings

- **Performance Improvement**
  - ◆ Compliance
  - ◆ Risk Management
  - ◆ Patient Safety
  - ◆ Performance Improvement
  - ◆ JCAHO Compliance
  - ◆ Core Measures

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Evaluate Meetings

- SCCH Committees meet on a two-month rotation
- Published calendar
- Timed agenda
- Majority of prep work is done outside the meeting
- Meeting time is spent reviewing/ discussing and approving/ disapproving

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Create Functional Work Teams

- Chart review/audits

- Meeting prep

- Concurrent Review

- Chargemaster/Compliance Audits

- Regulatory Readiness

- Core Measure Review

- Delegate, delegate, delegate!!

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Chart Review Audits

- Each department does their own based on pre-defined criteria (Med Staff)
  - OB
  - ER
  - Surgery
  - Med/Surg
  - ICU

- Charts which "fail" pre-audit are taken to respective Committee meeting for physician/peer review

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Meeting Prep

- Applicable department director responsible for setting agenda items

- CO/QI creates
  - meeting packet
  - minutes

- Only appropriate items forwarded to MEC

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Concurrent Review

- HIM responsible for process

- Case Management does actual review

Chargemaster/Compliance Audits

- **HIM Director**
  - ◆ Coding – inpatient/outpatient
  - ◆ Billing – unsupported/unbilled
- **Billing Office Manager**
  - ◆ Initiates LMRP's
  - ◆ ABN's
- **Laboratory Director**
  - ◆ Audits test accuracy
- **Who/what else?**

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Regulatory Readiness

- Department Managers are assigned to each chapter
  - JCAHO
  - Healthcare Facilities Accreditation Program (HFAP)
  - State Department of Health
  - CMS Conditions of Participation
- Assign additional department managers and/or staff as appropriate to each team
- CO/QI and/or CNO sits on each team
- Team documents compliance with each standard

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Core Measure Review

- Team Effort
  - CNO
  - HIM
  - CO/QI
  - Director of Patient Care Services
  - Case Manager
- Incorporate other reviews into Core Measure Review
  - Anthem/Blue Cross & Blue Shield
  - Pathway Analysis
- Pull chart once, review it all

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Tips for Success

- Primary role is to stay up-to-date on regulatory/compliance issues
- Utilize Internet
- Subscribe to as many "free e-zines" as you can
- Find 2-3 quality sources of information
  - Be choosy
- Learn how to use the "Forward" button!
  - Be a conduit - <u>Communicate</u>!

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Tips for Success

- **Trust is key**

- **Be proactive**
  - Create culture of continuous readiness

- **Power of true teams/teamwork**

- **How can you work together if you don't know each other?**
  - Connection Meeting

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Connection Meeting

- **Informal - Administration not allowed**

- **Not mandatory**

- **Share what's happening in our departments**
  - ◆ Opportunity to share personally as well

- **Standing agenda item at formal Dept Managers meeting**

- **Helps to create positive culture**

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- It is possible to have an 8 to 5 job!

- Start now by evaluating what you do & how you do it!

- Good Luck!!!