Compliance Officer’s Role in Regulatory Readiness

Kaye P. Nance, Director, Patient Services, QHR
Kathy Weber, Quality Improvement Coordinator, Sullivan County Community Hospital
8th Scope of Work

CMS
QIO
HIPAA
NFPA
HFAP
DHHS
OSHA
NCQA
JCAHO
CDC
FDA
NQF
OIG
IHI
State Department of Health
Current Environment

- Survey Readiness
- Corporate Compliance
Survey Readiness

- CMS – MCoPs
- JCAHO
- HFAP / AOA
- OSHA
Additional Survey Activity

- Generated by:
  - Patient Complaints
  - EMTALA
  - OSHA
Corporate Compliance

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

- Pay for Performance (P4P)
- Quality Reporting
- Patient Safety / Error Reporting
Transformation

■ Survey Readiness
■ Corporate Compliance
■ QUALITY / SAFETY
So…..the Compliance Officer is a conduit of:

- Accrediting / Certifying Bodies Regulations & Standards
- Compliance requirements
- Quality and Safety Initiatives
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
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
Evaluate Meetings

- Performance Improvement
  - Compliance
  - Risk Management
  - Patient Safety
  - Performance Improvement
  - JCAHO Compliance
  - Core Measures
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
Create Functional Work Teams

- Chart review/audits
- Meeting prep
- Concurrent Review
- Chargemaster/Compliance Audits
- Regulatory Readiness
- Core Measure Review
- Delegate, delegate, delegate!!
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
Meeting Prep

- Applicable department director responsible for setting agenda items

- CO/QI creates
  - meeting packet
  - minutes

- Only appropriate items forwarded to MEC
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?
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
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
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 - Communicate!
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
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
- It is possible to have an 8 to 5 job!
- Start now by evaluating what you do & how you do it!
- Good Luck!!!