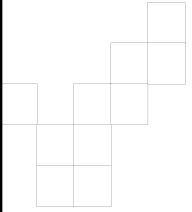



Affinity Health Plan
Dedicated to Excellence



Fraud, Waste, and Abuse Program and the Compliance Plan

HCCA Compliance Institute
April 21, 2013
David Crawford, Director of Corporate Compliance

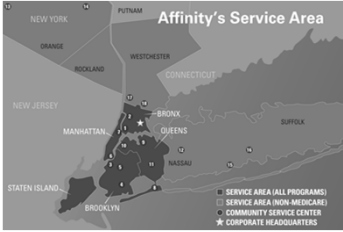


Affinity Health Plan


HISTORY: Founded in 1986 as an independent, not-for-profit managed care organization, specifically designed to serve the needs of low income New Yorkers.

EMPLOYEES: 798

MEMBERS: 263,955



*Demographics as of December 2012



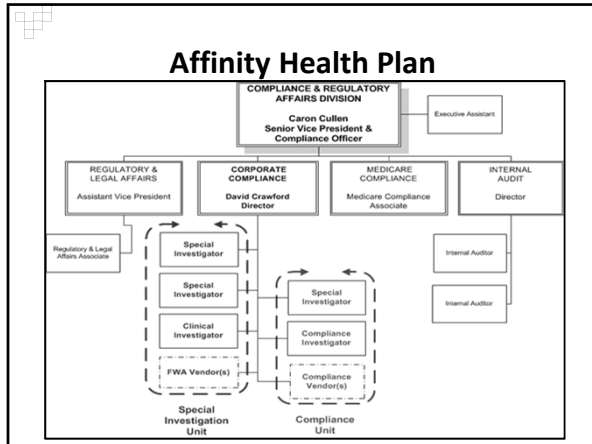
Affinity Health Plan

BUSINESS LINES:

- ❖ Medicaid Managed Care
- ❖ Family Health Plus
- ❖ Child Health Plus
- ❖ Medicare Advantage Dual Eligible SNP

FUTURE BUSINESS LINES 2013-2104:

- ❖ NY Managed Long Term Care Program
- ❖ Service Area Expansion (SAE)
- ❖ Capitated Financial Alignment Demonstration (CFAD) which in NY is known as Fully Integrated Dual Advantage (FIDA)
- ❖ Health Insurance Exchanges (HIX)



Affinity Health Plan

COMPLIANCE UNIT:

The purpose of the Compliance Unit (CU) is to protect Affinity's integrity by identifying, investigating, and resolving instances of healthcare fraud and compliance-related allegation.

This includes, but is not limited to: violations of the Code of Ethics, Marketing / Facilitated Enrollment Integrity Program, potential risks to Affinity's business, related regulations, and takes appropriate action to control, monitor, and mitigate future activity.

Affinity Health Plan

SPECIAL INVESTIGATION UNIT:

The purpose of the Special Investigation Unit (SIU) is to protect Affinity's financial resources from fraudulent or erroneous billings and claims by identifying, investigating, and resolving instances of healthcare fraud and compliance-related allegations.

This includes, but is not limited to: suspected fraudulent or abusive billing, potential risks to Affinity's business, related regulations, and takes appropriate action to control, monitor, and mitigate future activity.

Affinity Health Plan

COMMITTEES WITH COMPLIANCE INVOLVEMENT:

- ❖ Executive Management
- ❖ Senior Leadership
- ❖ Corporate Compliance & Risk Management
- ❖ Compliance & Continuous Quality Improvement
- ❖ Information Security
- ❖ Membership Satisfaction
- ❖ Benefits
- ❖ Operations
- ❖ Clinical Affairs
- ❖ Pharmacy & Therapeutic
- ❖ Credentialing & Provider Affairs
- ❖ New Business Initiatives

Let's do the Right Thing...Together. Fraud Free, Audit Ready.

Affinity Health Plan

ABC Health Plan
YYYY Compliance Work Plan
MM/DD/YYYY to MM/DD/YYYY

Department	Audit and/or Monitor	Goals and Objectives	Risk / Priority Level	Time Frame	Estimated Completion Date
Corporate Compliance	Fraud, Waste, and Abuse	To enhance the Special Investigation Unit's (SIU) processes and procedures while assuring ABC has an integrated Fraud & Abuse Prevention Program which meets SDOH requirements. 1. Improve access to ABC's data, vendor data, and the SIU's ability to identify FTA's patterns. 2. Design and implement a process to flag claims that have had settlement action (Stateholders, Finance, Provider Payments, Claims, and SIU). 3. Enhance the Compliance and SIU case tracking platform for increase security measure, documentation consistency, result tracking, and file management.	H	1st, 2nd, & 3rd Qtrs	MM/DD/YYYY

Sample Audit/Monitor Categories:

Fraud, Waste, and Abuse Compliance Awareness HIPAA	Facilitated Enrollment / Outreach, Oversight Claims Adjudication
--	--

*Refer to handout for full sample of a Compliance Work Plan

Affinity Health Plan

Fraud, Waste, and Abuse Work Plan
MM/DD/YYYY to MM/DD/YYYY

Requirements	Targeted Activities	Estimated Completion Date	Actual Completion Date	Comments
Special Investigations Unit	1. Review personnel for Fraud and Abuse Prevention Plan. 2. Conduct independent fraud data mining including: a) medical specialty analysis, b) address code analysis, c) member subscriber analysis, and d) provider facility analysis. 3. Review the claims database for expired members to identify any potential deceased members on our roster. 4. Conduct quarterly analysis to capture potential members with multiple CD's.	1Q/YYYY	Ongoing	
		3Q/YYYY	Ongoing	

Sample Requirement Categories:

Special Investigation Unit Provision of Preventative Services Underutilization Marketing & Outreach	Provisions of Medically Necessary Services PCP Assignments Claims Vendor Oversight
--	---

*Refer to handout for full sample of a Compliance Work Plan

Affinity Health Plan

MEASURING EFFECTIVENESS:
Program Effectiveness = Structure * Process * Outcomes

Structure – The capacity of a program to promote compliance with applicable regulatory requirements as reflected in an adequate program infrastructure.

- ❖ Is the reporting structure sound?
- ❖ Are compliance and FWA functions in place and sufficient?
- ❖ Do the compliance and FWA work plans align with the elements of an effective program?
- ❖ Are the right players involved?

Affinity Health Plan

MEASURING EFFECTIVENESS:
Program Effectiveness = Structure * Process * Outcomes

Process – How the program operates in practice to address identified risk areas.

- ❖ Are the right P&Ps in place and being followed?
- ❖ Is the Code of Ethics up-to-date and adhered to?
- ❖ Are the compliance and FWA work plans carried out?

Affinity Health Plan

MEASURING EFFECTIVENESS:
Program Effectiveness = Structure * Process * Outcomes

Outcomes – The actual performance of the organization on the identified compliance standards.

- ❖ What are the volume and impact metrics?
- ❖ Is resolution timely?
- ❖ Are the systems relied upon to prevent, detect, and respond to incidents/events/cases tested?
- ❖ What are the results of surveys, interviews, and self-assessments?
- ❖ How do we compare to industry standards?

Affinity Health Plan

CONSIDERATIONS:

Is there an uniform, reliable, and auditable incident tracking system in place?

Important categories:

- ❖ Dates
- ❖ Type of Incident
- ❖ Source
- ❖ Subject(s)
- ❖ Activity Details
- ❖ Impact
- ❖ Outcome

Affinity Health Plan

CONSIDERATIONS:

Are you able to provide a qualitative and/or quantitative analysis of the following FWA prevention and detection activities?

- ❖ Staff and Business Partner Trainings
- ❖ Number of SIU Meetings
- ❖ Public Awareness Campaigns
- ❖ New Initiatives
- ❖ Technological Enhancements
- ❖ Internal Plan Monitoring
- ❖ Trends in the SIU Case Mix
- ❖ Impact and Resolution of Abhorrent FWA Patterns
- ❖ ROI of the SIU
- ❖ Corrective Actions Resulting from the SIU

Affinity Health Plan

If you have any questions, please contact:

David Crawford
 Director of Corporate Compliance
 Compliance & Regulatory Affairs
dcrawford@affinityplan.org
 (718) 794-5738
