



Risk Assessments and Work Plans- Key Spokes in the Circle of Compliance

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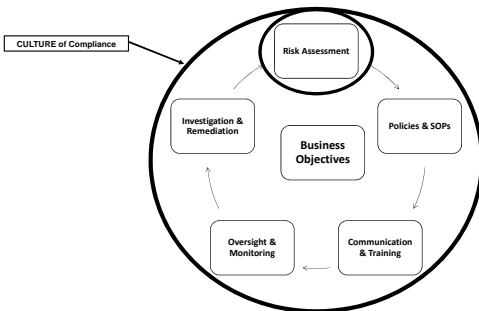
Agenda

- Why risk assessments are essential
- Sample approach to conducting a meaningful risk assessment
- Compiling and reporting results
- Developing remediation activities and Work Plan items to address risk assessment findings



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Compliance Life Cycle



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Risk Assessments and Work Plans—An Overview

Defined: A Risk Assessment is the identification and evaluation of potential risk within your organization. It involves the analysis of systems and processes against a benchmark, standard, law or regulation along with the determination of the level risk (high, low, or medium) associated with the activity.

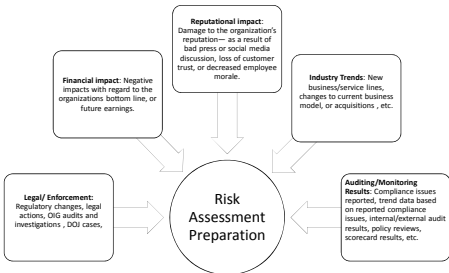
Work Plan: The purpose of a Work Plan is to address risk identified in the Risk Assessment process that created the greatest exposure to an organization. Components of the Work Plan include: clear description of the risk, identification of current controls and safeguards in place, assignment of accountability for remediation the risk, and due date for completion.

Reporting: An effective Work Plan must be communicated to all key stakeholders at the beginning of the process and with periodic updates on the status of the Work Plan. At a minimum it should include Senior Leadership and the Governing Body of the Organization. In addition the Work Plan is a useful tool in promoting compliance to others within the organization.



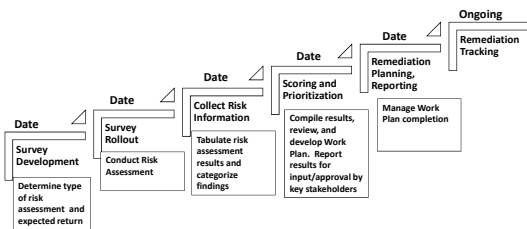
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Risk Assessment Preparation

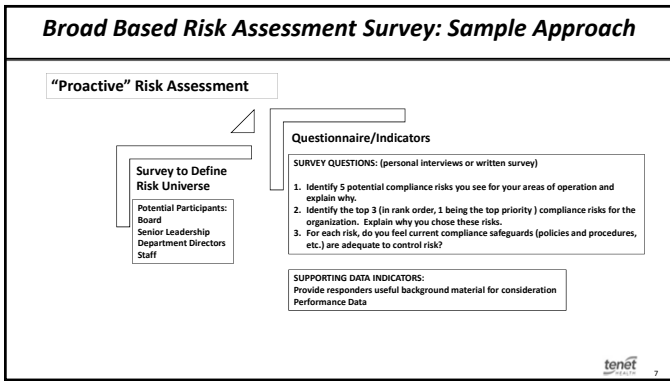


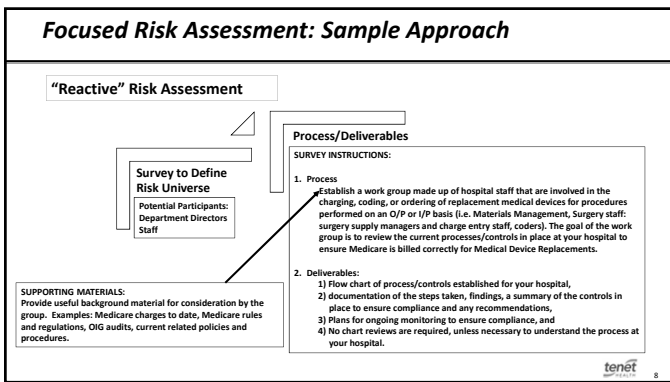
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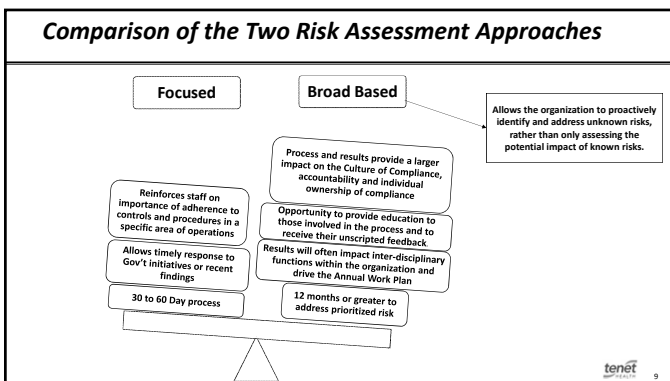
Risk Assessment Process: Sample Approach



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Sample Survey

SECTION II: HOSPITAL RISK IDENTIFICATION

COMPLIANCE RISK SURVEY

Directions: Review the top five Compliance risks for your facility. For each risk select the most significant contributing factor and identify the level of risk. You are also asked to provide an explanation of your selection. (i.e., why did you select this risk?)

Risk Area:

Contributing Factor:

Level of Risk:

Explanation of Risk:

Sample Response:

SECTION III: SUFFICIENT RISK IDENTIFICATION

Please identify the top three Compliance risks that represent your facility. List the risk in writing under each of today's heading. For each risk state the level of risk and identify whether or not your facility's safeguards have been implemented. You are also asked to provide an explanation of your selection. If you believe the current safeguards are adequate, leave blank.

Risk Area:

Level of Risk:

Are there sufficient safeguards?

Explanation of your selection:

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Summary of Key Data Points Resulting from the Survey

Data Points

- Risk Area or Category assists in analyzing the overall survey results.
- Primary Contributing Factors help to further understand the reason for the perceived risk.
- Sufficient Safeguards identify if current safeguards are adequate.
- Risk Level assessed as High or Elevated, Medium, Low or alternatively whether it Will Happen, Most Likely to Happen, Might Happen, Likely not to Happen.
- Free Text Comments will contain a wealth of information that may generate additional categories for use in evaluating and tabulating the data.

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Categorizing Free Text Data: Examples

Regulatory	Physician Management	Hospital Operations
<ul style="list-style-type: none"> Medical Necessity Physician Management Provider Based Entities 	<ul style="list-style-type: none"> Credentialing Medical Staff Management Employed Physicians 	<ul style="list-style-type: none"> Policy Management New Service Lines Leasing Equipment


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Work Plan Design: Sample Approach

Regulatory

Core Focus Areas


- Physician Relationships
- Provider Based Entities
- Medical Necessity



Work Plan Design: Sample Approach

Regulatory

- Design training for leadership on how to have difficult conversations with physician from a legal, compliance and regulatory perspective **Physician Relationships**
- Evaluate the "Site Neutral Payment" Finals Rules impact on provider based entities **Provider Based Entities**
- Review processes used to determine medical necessity for inpatient status and O/P procedures **Medical Necessity**




Work Plan Design: Sample Approach

Hospital Operations

Core Focus Areas

- New Service Lines
- Joint Venture/Partnership Management




Work Plan Design: Sample Approach

Hospital
Operations

- Design and develop tools for use when exploring and implementing new service lines,
- Evaluate monitoring effectiveness of Joint Ventures/Partnerships

New Service Lines

JV/Partnership Management



Work Plan Design: Additional Risk Considerations

Hospital Operations


DOJ/OIG
Enforcement Trends

OIG Compliance
Reviews

Internal
Investigations Trend

Hotline
Call Trends


Audit Findings
(Internal and External)



Work Plan Monitoring: Sample Approach

Hospital Operations

2017 Work Plan				Focus Area	
Focus Area	Description	Current Risk/Mitigation	Action Items	Leader(s)	Due Date
Hospital					
Regulatory	Design training for leadership on how to have difficult conversations with physician from a legal, compliance and regulatory perspective				
	Evaluate the "Site Neutral Payment" Final Rules impact on consider based entities				
	Review processes used to determine medical necessity for inpatient stays and O/P procedures				
Hospital Operations					
	Design and develop tools for use when exploring and implementing new service lines				
	Evaluate monitoring effectiveness of Joint Ventures/Partnerships				



Questions?





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Slide 23

RL14 We should add a slide for Questions?

Range, Laura, 2/14/2017