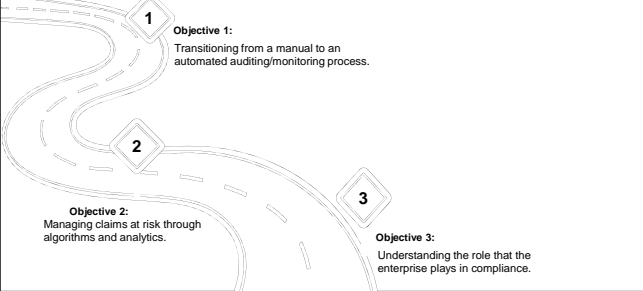


Analytics: Enhancing Your Hospital Compliance Program



Kate Conklin, B.A., CPMSM, CPHQ, Chief Compliance Officer
Trissi Gray, MBA, CHRC, Assistant Director, Health System Compliance

Today's Session



1 **Objective 1:**
Transitioning from a manual to an automated auditing/monitoring process.

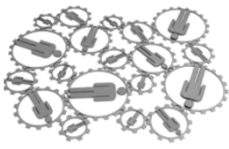
2 **Objective 2:**
Managing claims at risk through algorithms and analytics.

3 **Objective 3:**
Understanding the role that the enterprise plays in compliance.

2.2

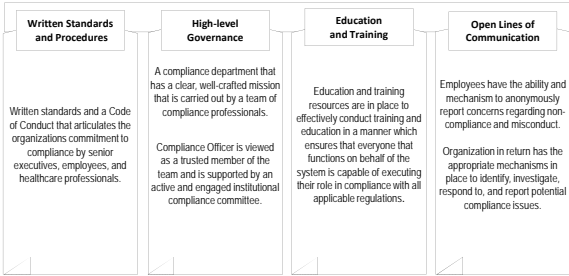
Polling Question: What is Your Role in Compliance?

- A. Compliance Officer
- B. Legal Counsel
- C. Compliance Administrator/Specialist
- D. Billing/ Coding Compliance
- E. Other



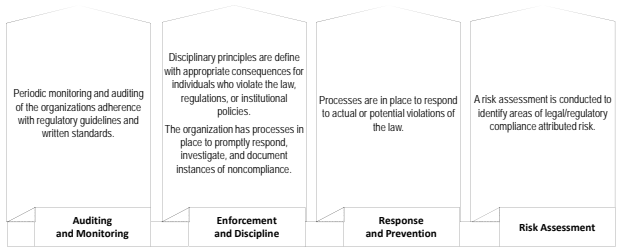
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Compliance: Roles and Responsibilities



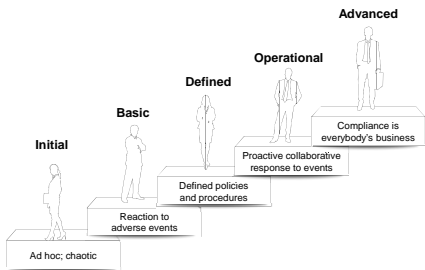
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Roles and Responsibilities (continued)



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Optimizing Resources: Program Maturity



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Polling Question: Organization Compliance Program Maturity

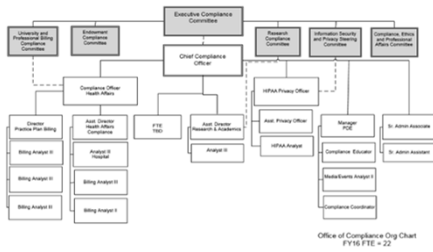
Compliance Program:

- A. Ad Hoc
- B. Fragmented
- C. Defined
- D. Operational
- E. Advanced



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Compliance Program Infrastructure

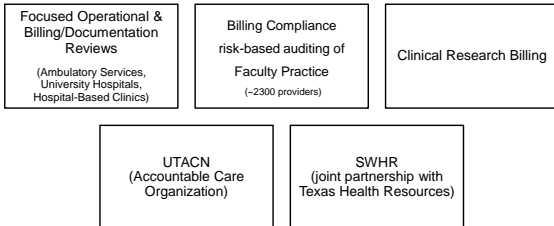


Office of Compliance Org Chart
FY16 FTE = 22

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Program Responsibility: Health System Compliance

Compliance program monitoring and advisory engagement includes:



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Compliance: Auditing and Monitoring

Element of an effective compliance program is to conduct periodic auditing and monitoring of the organization's adherence with regulatory guidance and established written standards.

Audit and Review Types:

Baseline	• High level review
Probe	• Determine whether a compliance issue exists
Routine	• Evaluate ongoing compliance
Expanded	• Enlarge sample based on error rates identified during a routine audit
Focused	• For cause review

Risk Identification: Organizational Strategic Initiatives

Auditing and Monitoring: Compliance Risk Areas

- Inpatient Rehabilitation Facility
- Cochlear Implants: Recalls
- Bariatric Surgery
- Overlapping Surgeries
- High Dollar Chemotherapy Drugs
- Sleep Testing
- Major Joint Replacements: Hip and Knee
- Hyperbaric Oxygen Therapy and Skin Substitutes
- Short Stays: 2 Midnight Rule



Polling Question: Does your facility use analytical software to conduct compliance reviews/audits?

- A. Yes
- B. No



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Compliance Monitoring: Manual Process

- Identifying most recent claims
- Risk universe
- Gross charges vs. net charges
- Claim reports (4 systems) prior to centralization
- Manual Spreadsheet
- Reporting
- Audit Retention



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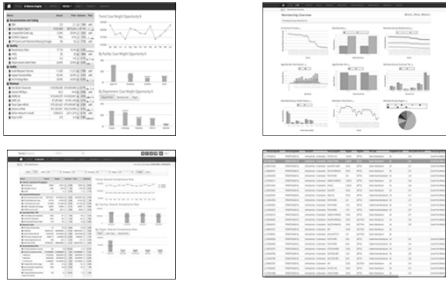
New Age Compliance: Using Analytics to Identify and Audit Risk

- Standardized solution for inpatient and outpatient data, that utilizes claims data (835/837s)
- Daily evaluation of compliance-attributed risk and coding outliers
- Leverage Medicare and Medicaid audit rules as well as, MEDPAR and PEPPER benchmarks.
- Data mining and proactively identify compliance risk
- Robust workflow to manage deadlines, additional documentation requests and external audit request.



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Identifying Risk: Using Analytics



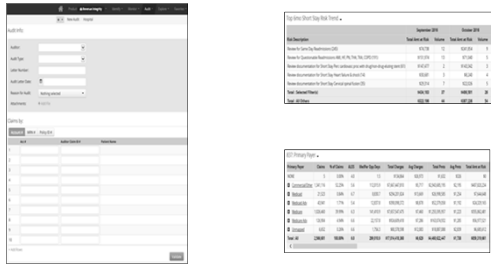
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Auditing: Trust But Verify



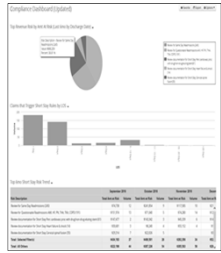
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Using Analytics: Risk-Based Auditing



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Reporting: Compliance Dashboards

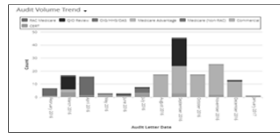
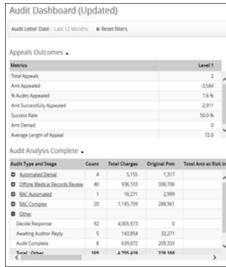


System Dashboard Users:

- UH Leadership (CFO, COO)
- Compliance
- Internal Audit
- Utilization Review
- Decision Support
- Revenue Integrity
- Denials
- Coding and CDI
- Revenue Cycle Operations

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Reporting: External Audit Dashboards



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Stakeholder Engagement: Advocating Change



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Compliance Program: Mission, Vision and Value

Each day our patients, students, and the public count on us to deliver the very best in patient care, state-of-the-art research, and outstanding medical education. As a University, we strive to meet and exceed these goals. By fostering a culture of compliance with established policies and standards, we reassure the community of our commitment to adhering to all applicable laws, rules, and policies.

Daniel K. Podolsky, M.D.
President, UT Southwestern Medical Center

Source: UT Southwestern Medical Center, Standards of Conduct (2013)

Rules of Engagement: Executive Trust

- Finding ways to connect with the CEO, CFO, COO and CNO
 - Tone at the Top: Culture of Ethics and Compliance
 - Executive Leadership Team Compliance Rounding
 - Executive Leadership Team- Dedicated Quarterly Meetings for Compliance
 - Meaningful Data: Compliance Dashboards, Real-time Auditing and Monitoring

- Compliance - Valued Addition to Operations
 - Accreditation and Patient Safety
 - Revenue Cycle Operations (HB and PB)
 - Clinical Research
 - Hospital and Ambulatory Services-Operations



Compliance: The Change Agent



Understanding the Marriage: Operations vs. Compliance



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Rules of Engagement: Collaboration and Transparency

- Culture: Embedding a "just culture mindset" is key.
- Communication: clear, concise and engaging discussions regarding strategic initiatives, organizational risks (appetites) and risk mitigation.
- Cross-Functional Risk-Management Approach: Eliminating silos and amplifying change agent teams to mitigate risk.
- Report, Report, Report: Establish KPIs and benchmark against organizations and other academic medical centers.
- Continuous Process Improvement: Plan, Do, Study, Act



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