Physician, Quality and Compliance Collaboration for a More Effective Compliance Program

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Integrity Office Reporting Lines

CEO

Chief Integrity Officer

Audit Committee of the Board of Directors

Board of Governors

IT Security
Office of Internal Audit
Office of Corporate Compliance

Corporate Compliance Committee
Research Compliance Committee
Regional Hospital Compliance Committee
Corporate Compliance

- Office that focuses on preventing and detecting regulatory risk
- Creates, administers and monitors the entity’s compliance & ethics program
- Has an advisory and educational role
- Some operational responsibilities (e.g., HIPAA)
- Partners with Internal Audit & I.T. Security
Hospital Accountability

• Each Hospital is required to:
  - Implement and execute all 7 elements of the CCHS Corporate Compliance Program within its operations
  - Conduct annual risk assessment & develop a work plan to mitigate those risks
  - Maintain documentation to demonstrate proof of effectiveness

Compliance Committee Charter

• Oversight of compliance programs performed by Institutes and Non-Medical departments
• Review individual annual compliance program reports for complying with the seven elements
• Review proposed compliance policies and present to BOG for approval
• Ensure consistent application of the program across the health system
Diverse Committee Membership

- Physicians (3)
- Human Resources
- Medical Operations
- Nursing
- Quality
- Coding
- Billing
- Legal
- Compliance (3)
Committee Member Value

- Committee members not only evaluate the programs, they can:
  - Aid in resolution / mitigation
  - Recognize inconsistencies
  - Help develop needed education
  - Cascade learnings back to their areas

Key Compliance Risks

- Compliance programs should prevent and detect compliance issues and concerns
- The top compliance risks for any healthcare organization will include:
  - Patient Quality and Safety
  - Billing
- Physicians and Quality are at the center of both
- Both should be involved in the risk assessments
Physician Participation

• Play a key role in identifying and evaluating compliance risks
  - Evolved in direct patient care
    • ABNs
    • Telehealth, eConsults
  - Documentation and coding
  - Utilize electronic and paper records (HIPAA)
• Physician chair’s the compliance committee
Quality Participation

• Quality care is not only important, but so is clinical quality data accuracy
  - Public reporting of quality data
  - Pay for performance
• Compliance monitoring for:
  - Informed consents
  - Universal protocol
• Education of caregivers

Summary

• Physicians and Quality play key roles in an effective compliance program:
  - They are involved with the top compliance risks
  - They can identify and evaluate issues and concerns
  - They know how future actions may impact operations
  - They can help cascade needed information into operations
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