Compliance Effectiveness through Channels of Communication and Investigations

Health Care Compliance Association
Managed Care Compliance Conference

Andrew Finkelstein, JD, CCER, CHPC
Vice President, Compliance and Medicare Compliance Officer
Health Partners Plans

Health Partners Plans

- Not-for-profit, hospital owed, health maintenance organization
  - Aria Health, Einstein Medical Center, Temple University Hospital
- Serving more than 280,000 members in Southeastern Pennsylvania
  - Bucks, Chester, Delaware, Lancaster, Lehigh, Montgomery, Northampton, and Philadelphia counties
- Medicaid, Medicare and Children’s Health Insurance Program (CHIP) lines of business
- Health Partners Foundation supports low-income communities in Philadelphia and surrounding counties with educational programs, scholarships, emergency assistance and more!
Communication Procedures

1/1/14: Medicare Go-Live!

3/16/16: Program Audit Notice

If you build it,...
Communication Procedures

Investigative Practices

Identification

Presentation

Preparation

Analysis

Collection
### Quantifying Communication

**Medicare Compliance Program - Issues Log (YTD)**

<table>
<thead>
<tr>
<th>Triage Category</th>
<th>Source</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clarification</td>
<td>MCD Management@Email</td>
<td>Assigned to MCD by CTC Triage (CTC Triage, GRC, SIU, Privacy/Security)</td>
</tr>
<tr>
<td>Incident</td>
<td>MCD Management@Email</td>
<td>Assigned to MCD by CTC Triage (CTC Triage, GRC, SIU, Privacy/Security)</td>
</tr>
<tr>
<td>Inquiry/General Question</td>
<td>MCD Management@Email</td>
<td>Assigned to MCD by CTC Triage (CTC Triage, GRC, SIU, Privacy/Security)</td>
</tr>
<tr>
<td>Assigned to MCD by CTC Triage (CTC Triage, GRC, SIU, Privacy/Security)</td>
<td>In Progress</td>
<td>Closed</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Source</th>
<th>Status</th>
<th>Reported to CMS</th>
</tr>
</thead>
<tbody>
<tr>
<td>67</td>
<td>6</td>
<td>9</td>
</tr>
<tr>
<td>6</td>
<td>9</td>
<td>64</td>
</tr>
<tr>
<td>0</td>
<td>9</td>
<td>64</td>
</tr>
</tbody>
</table>

**Examples:**
- **Clarification**: Confirmation of CMS deadlines, or day-to-day questions
- **Incident**: Suspected/confirmed operational non-compliance, systemic issues, or member concerns
- **Inquiry**: Request for regulatory research, or implementation of HPMS memos

---

Health Partners Plans
Case Studies

#1: SNP-MOC

#2: Welcome Kits

#3: Provider Compliance

Contact

Andrew Finkelstein, JD, CCEP, CHPC
Vice President, Compliance; and, Medicare Compliance Officer
Health Partners Plans
901 Market Street, Suite 500
Philadelphia, PA 19107
o: 215-991-4305
e: afinkelstein@hpplans.com