Compliance Effectiveness:
Reporting through Dashboards

Lynda Hilliard, CHC, CCEP, MBA, RN
Principal
Hilliard Compliance Consulting, LLC

Session Objectives

• Understand the key elements of a compliance program dashboard
• Identify strategies to prioritize data to be reported based upon compliance risk
• Develop a baseline compliance dashboard
• Evaluate the “usefulness” of the data reported

Compliance Program Maturity Determination

Mature
- Technical and business tools are used to enhance competitive advantage
- Compliance processes because tasks are better planned and coordinated
- Maximum flexibility: “Anticipatory”
- Participates with government regulator setting standards and policies

Evolving
- “Putting Fires” mentality
- Adopting more open approach with government regulators
- Flexible enough to withstand and learn from regulatory situations
- More integrated with other operational units

Emerging
- “Put out fires” mentality
- Minimum level of compliance
- Inflexible
- No corporate-wide compliance process and systems
Why Dashboards?

- Dynamic management tool to gauge performance and progress toward specific goals.
- Spans multiple dimensions of organization impacting regulatory compliance.
- Ability to identify trends, issues in "real time" – thereby helping to optimize timeliness and productivity in mitigating the issue.

Dashboards may look like other tracking mechanisms, but tend to be more:

- Predictable - reporting schedule
- Consistent format
- Not used as an accounting measure, but more a management tool
- Useful as a method to streamline information collection and sharing.

Key Elements of an Effective Dashboard

Potential Areas to Measure

1. Alignment with Organizational Mission
2. Meeting Regulatory Requirements
3. Quality of "Product"
4. Cost Reduction and/or Avoidance
5. Cycle Time Reduction
6. Meeting Commitments
7. Timely Response
8. Employee Knowledge of Program
Data Sources and Challenges

- Reliability and validity of data
- Ongoing data requirements
  - Ability to have data automatically reported to compliance vs compliance having to request data
  - Time and productivity element of data collection and reporting
  - Turf Issues related to data sharing (e.g., Risk Management, HR, IT etc)

Sample Dashboard Formats

Key Dashboard Indicators

- New Programs
  - Signed Acknowledgement Forms Submitted/Total Number of Employees
  - General Training Completed/Total Number of Employees
  - High Compliance Risk Training Completion/Total Universe Required
  - LEIE Screening Completed at Time of Hire/New Hires during Period
  - Provider Credentialing Completed/Number up for renewal
Key Dashboard Indicators – New Programs

• Dept Submission of Compliance Work Plans/Total Number of Depts
• Conflict of Interest Statements Submitted/Universe Required
• Compliance Committee Meetings with Quorums/Total Compliance Committees
• HIPAA Breach Reports

Key Dashboard Indicators – Emerging Programs

• Signed Acknowledgement Forms Submitted/Total New Employees
• General Compliance Training Completed for Current Year/Total Employees
• LEIE Ongoing Screening Completed per Reporting Period/Universe of those Required
• Provider Credentialing

Key Dashboard Indicators – Emerging Programs

• Conflict of Interest Statements Submitted
• Medicare/Medicaid Denial Rate – YTD
• RAC Audits – YTD
• Rate of RAC claims approved – YTD
• HIPAA/Privacy Breach Reports
Key Dashboard Indicators – Mature Programs

- Mandatory Training Completion/Total Employees
- Substantiated Hotline Issues/Total Relevant Calls
- HIPAA Breaches Substantiated/Total Number Reported
- Medicare/Medicaid Denial Rate – YTD
- Rate of RAC claims approved – YTD
- Prioritized Risk Issue(s)/relevant universe

Other Indicators

- Health Systems
- Managed Care
- Behavioral Health
- Rehabilitation
- Home Health/Hospice
- Skilled Nursing
- Others

Next Steps

Evaluate Dashboard Effectiveness
1. Annually review the currency of the indicator being monitored
   ✓ Is it still relevant? Or has the problem been solved?
   ✓ Report on the progress of the risk mitigation (Annual Report report of success/need for more work) through a more detailed analysis of the submitted data.
Next Steps

2. Update Dashboard with items of “value” to management and compliance
   ✓ Based on risk assessment or identification of potential high area(s).

Questions

For more information:

Lynda Hilliard
lishilliard1980@gmail.com
530-925-1024