


MISSION POSSIBLE: A TEAM APPROACH TOWARDS COMPLIANCE, CASE MANAGEMENT, AND QUALITY

BY:
 SANDY KELLER, RN, CHC, IP COMPLIANCE
 KAREN HAY, RN, CHC, COMPLIANCE MANAGER
 CAROLINE MARCEAUX, RN, MSN, CMO ACADIA GENERAL HOSPITAL
 KATIE SCHWALZ, RN, ACM, DIRECTOR OF CASE MANAGEMENT, ACADIA GENERAL HOSPITAL
 NEW ORLEANS REGIONAL HQCA CONFERENCE
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OBJECTIVES

- PRACTICAL GUIDANCE FOR INCORPORATING COMPLIANCE INTO OPERATIONAL PROCESSES
- STRATEGIES FOR SHIFTING FROM AN EXTERNAL, REGULATORY FOCUS TO INTERNAL ALIGNMENT
- LEVERAGING TECHNOLOGY AND DATA TO EFFECT CHANGE

COMPLIANCE

- DEPENDENCE ON THOSE DOING THE WORK ON THE FOREFRONT THAT MAINTAINS THE ORGANIZATIONS COMPLIANCE WITH RULES & REGULATIONS
- DISCUSSION OF SCENARIOS HIGHLIGHTING THE IMPORTANCE OF CASE MANAGEMENT, QUALITY, & COMPLIANCE.
 - 2 MIDNIGHT RULE
 - REPORTING A CONCERN/CULTURE
 - COMPLIANCE & REGULATORY COMMITTEE

Healthcare is "compliant" if...

Requirements

1. It meets quality standards;
2. Is medically necessary;
3. Is provided by qualified physicians and staff;
4. Is provided without improper financial incentives;
5. Is provided in a way that respects patient's rights;
6. Is provided in an approved facility;
7. Is reimbursed correctly;
8. Is documented, charged, and billed correctly.

Laws / Rules

- Scope of Practice/Licensure Issues
- Stark/AMS
- OCR/HIPAA
- False Claims Act/Overpayments Rule
- CMS CoPs
- OIG exclusions

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**SCENARIO ONE
2 MIDNIGHT RULE &
MEDICAL NECESSITY**

**KATIE SCHMALTZ, RN, ACM, DIRECTOR OF CASE MANAGEMENT,
ACADIA GENERAL HOSPITAL**

2 MIDNIGHT RULE SCENARIO

- **ADMISSION ORDERS**
- **DOCUMENTS**
- **AUDITS**
- **KEY PLAYERS WORKING TOGETHER**

UTILIZATION REVIEW ADMIT TO DISCHARGE AND BEYOND

- **MEDICAL NECESSITY REVIEW**
- **PHYSICIAN ADVISOR**
- **UR COMMITTEE**



LIST OF REGS/REQUIREMENTS DEPENDENT ON CASE MANAGEMENT

- **MEDICAL NECESSITY – FALSE CLAIM**
- **UR PLAN – CONDITION OF PARTICIPATION – MEDICARE CERTIFICATION**
- **DISCHARGE PLANNING – CONDITION OF PARTICIPATION – MEDICARE CERTIFICATION**
- **IMPORTANT MESSAGE & MOON – CMS BILLING REQUIREMENT**
- **SIGNED IP STATUS ORDER – CMS BILLING REQUIREMENT**
- **INPATIENT ONLY PROCEDURES – CMS BILLING REQUIREMENT**
- **REVIEW INFORMED CONSENTS – COP & LOUISIANA LAW**
- **PHYSICIAN COMPETENCY AND QUALITY – CONDITION OF PARTICIPATION – GOVERNANCE**

**SCENARIO 2
SURGERY INSTRUMENT
WITH TISSUE**

**CAROLINE MARCEAUX, RN, CNO
ACADIA GENERAL HOSPITAL**

BE OBJECTIVE- INVOLVE SOMEONE EXTERNAL

- INVOLVING SOMEONE EXTERNAL SHOWS STAFF LEVEL EMPLOYEES THAT YOU ARE TAKING CONCERNS SERIOUSLY AND ARE WILLING TO REMOVE YOUR OWN BIASES.



INCREASE TRANSPARENCY WHEN SOMETHING IS *WRONG*

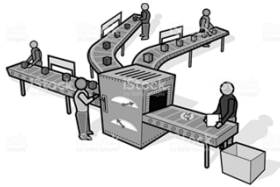
GET TO THE ROOT OF THE PROBLEM-

- RCA
 - FMEA
- MUST HAVE- STAFF CLOSEST TO THE WORK INCLUDED IN THESE PROCESSES**



GET LEAN

- CREATE STANDARDIZED WORK
- IMPROVE EFFICIENCY
- ELIMINATE VARIATION AND REDUCE ERROR RATES



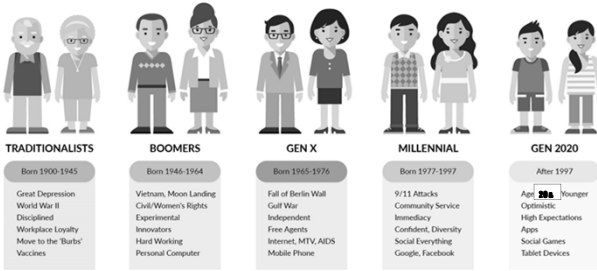
CULTURE

• WHAT IS A "JUST" CULTURE?

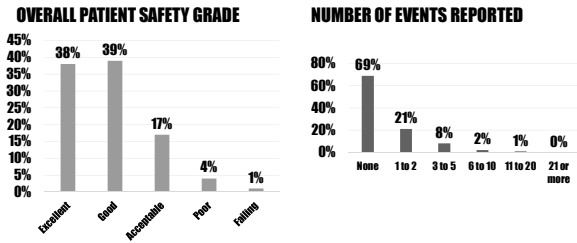
A JUST CULTURE EXISTS WHEN TEAM MEMBERS TRUST EACH OTHER, ARE REWARDED FOR PROVIDING INFORMATION ABOUT ADVERSE OUTCOMES AND EVENTS, AND ARE CLEAR ABOUT THEIR RESPONSIBILITIES REGARDING SAFE AND COMPLIANT BEHAVIORAL CHOICES.

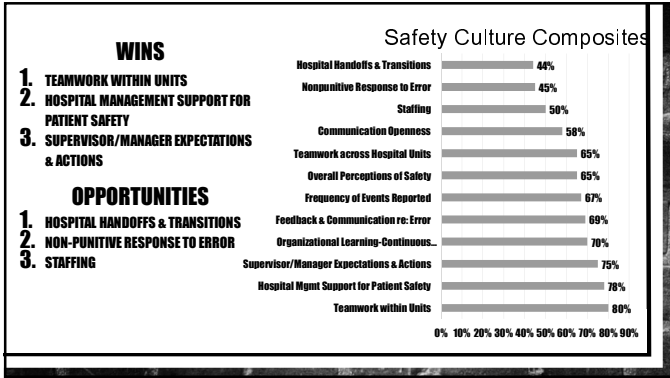
MOST IMPORTANTLY, THERE IS A *SHARED* ACCOUNTABILITY FOR RISK AVOIDANCE.

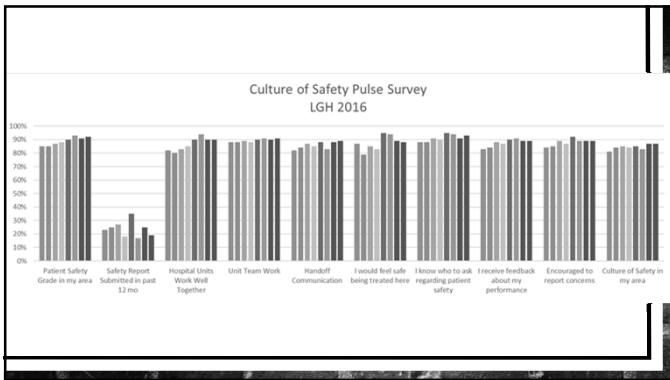
Five Generations Working Side by Side in 2020



PATIENT SAFETY CULTURE SURVEY RESULTS







JUST CULTURE DOESN'T *ONLY* SUPPORT SAFETY CULTURE

- Encourage Reporting
- Support Learning Organization
- Focus on Systems v. Individuals
- Coaching v. Punishing
- Root Cause Analysis
- Welcome and Embrace Surveillance
- Encourage Accountability and Ownership

Compliance

Case Management

Quality

LIST OF REGS/REQUIREMENTS DEPENDENT QUALITY

- REPORT A CONCERN – 7 ELEMENTS OF COMPLIANCE PROGRAM
- NON-RETALIATION – 7 ELEMENTS OF COMPLIANCE PROGRAM
- INVESTIGATE – 7 ELEMENTS OF COMPLIANCE PROGRAM
- POLICIES & PROCEDURES
- INFECTION CONTROL – CONDITIONS OF PARTICIPATION & THE JOINT COMMISSION

SCENARIO 3 COMPLIANCE & REGULATORY COMMITTEE BEST PRACTICE SHARING

KAREN MAL, RHIA, CRC, COMPLIANCE MANAGER
LAFAYETTE GENERAL HEALTH SYSTEM

CRC EVOLUTION



TECHNOLOGIES

- **ENSOCARE – CASE MANAGEMENT SOLUTION THAT INTEGRATES WITH ELECTRONIC MEDICAL RECORD**
 - RE-ADMISSIONS IDENTIFIED WHEN REGISTERED IN ED
 - INPATIENT ORDER SIGNATURE
- **COMPLIANCE TOOLS –**
 - INCIDENT SOFTWARE
 - SURVEY MANAGER/ AUDIT TOOL
 - NTHRIVE – RAC TRACKING TOOL
 - POLICY MANAGER – DATABASE FOR ALL POLICIES

QUESTIONS?

THANK YOU
