Population Health Compliance

Compliance Challenges in a Value-Based World

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Best Place to Give Care -
Best Place to Get Care

UMass Memorial - Community Healthink
UMass Memorial HealthAlliance-Clinton Hospital
UMass Memorial - Marlborough Hospital
UMass Memorial Medical Center
UMass Memorial Medical Group
UMass Memorial Accountable Care Organization, Inc.

Agenda

What is Population Health Compliance?

Unique Challenges for Pop Health Compliance

The Future of Compliance in a Value-Based Payment World
What is Population Health?

“An interdisciplinary, customizable approach that ... utilizes non-traditional partnerships among different sectors of the community – public health, industry, academia, health care, local government entities, etc. – to achieve positive health outcomes.”

- Centers for Disease Control and Prevention
What is Population Health Compliance?

**Objective of an Effective Compliance Program:**

To prevent and detect potential criminal conduct and promote a culture which ensures compliance with applicable state and federal laws and regulations, guidance, and organizational policies and procedures

...and collaborate with existing compliance structures of partner organizations to ensure compliance across the care continuum.

What is Pop Health Compliance?

**Collaboration between innovators, care givers, and existing compliance structures of partner organizations to ensure compliance with state, federal and program requirements across the care continuum.**

Medicaid.gov 115 Demonstration Projects

- "Alternative Payment Models"
- "Risk-Based Payment Models"
- "Value-Based Care"
- "Accountable Care Organizations"
- "Primary Care First"
- "Patient Centered Medical Home"
- "Medicare Shared Savings Program"

**Everyone, Everyday.**
Unique Challenges
One CCO’s perspective

Compliance Challenges

- Key Risks
- Scope of Compliance Responsibility
- Limited Guidance for Pop Health Compliance Models
- Program & Regulatory Overlap/Impact
Key Risks for Pop Health Compliance

Beneficiary Protections
- PHI
- Cherry Picking
- Access to Care
- Marketing/Communications

Financial Relationships
- Inducements & Gifts
- Gainsharing, Shared Savings
- Referral Sources

Data Integrity
- Reporting Requirements
- Data Collection
- Attestation

Compliance Oversight
- Training & Education
- Formal Compliance Programs
- Contractual agreements

Statutory & Regulatory Applicability
- Waivers
- Exceptions
- Other State/Fed Programs

Everyone, Everyday.

Scope of Compliance Responsibility – ACO

UMMHC
- 7 Hospitals
- 3 FQHCs
- 20 SNFs
- 48 Physician groups
- 434 PCPs
- 1461 Specialists
- 99 TINs
- 42 EHRs

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Harrington

Heywood

Holyoke

Everyone, Everyday.
Limited Guidance on Pop Health Compliance Programs

**OIG:**
- ACOs
- Fraud & Abuse Waivers

**CMS:**
- Program Regulations/Requirements
- ACO Tip Sheet

**Industry Associations:**
- National Association of ACOs (NAACOS)

Program & Regulatory Overlap – MSSP & MACRA

**Part B Medicare Fee-For-Service**
Incentive / Penalty Programs

- MSSP ACO
  - ACO Participants’ Performance impacts potential Shared Savings and Part B payments
  - Cost Claims

- Promoting Interoperability
  - Reported by Group Performance impacts Entire ACO
Looking Ahead
The future of compliance in a value-based world

Compliance Meet Innovation

“No Means No!!”
Sincerely, the Friendly Compliance Officer

Get Creative!
Disruptive Innovation

“My main message is this: Be bold. Take action. Compliance must have a seat—and a voice—at the innovation table.”

– Joanne Chiedi, Acting Inspector General, OIG

Get a seat at the table!
Best Place To Give Care – Best Place to Get Care

Everyone, Everyday.