

Upper Allegheny Health System
{Bradford Regional Medical Center & Olean General Hospital}
Onsite-Announced OMIG Visit
May 23 – May 25, 2011

The visit boasted identifying best practices and benchmarking our efforts to be able to calculate money saved in the future. They were respectful of each facilities intellect and their intention was to have a productive, collaborative visit.

Questions Asked:

CEO:

1. How often does compliance report to the Board?
2. How is the position split; we see she is the Compliance and HIM Director of a Health System?
3. Are you familiar with the OMIG website? Have you ever been there, accessed it?
4. Have you listened to any of the webinars?
5. How does the reporting structure to the BOD work? Explain.
6. How do you maintain and sustain an effective program? Explain some of these efforts.
7. How often do you meet with the Compliance Officer?
8. To whom does the position report?

COO:

1. Please describe your relationship with CO and the BOD.
2. How much interaction do you have with the Compliance Officer?
3. Are you involved in the training and education of compliance?
4. Do you meet regularly with the Compliance Officer?
5. Are you supportive of her? If she came to you with a concern, what would you do?
6. What resources are available to her? Is there any money to keep her program lively?
7. How do you actually see the reports from the CO?
8. What do they look like?

Risk Management:

1. Describe your interaction with the compliance function.
2. What functions do you have in your system to identify a compliance issue and report it?
3. What about to avoid and mitigate financial risk?
4. What protocols do you have re: Lab/Rad/Rehab; or do they come to you?
5. How do you collect your information and do you involve compliance in decisions and concerns?
6. Do you share your confidential PEER review information with compliance? Why or Why not?
7. Complaints/Internal Controls? Do you share them with compliance?

Compliance Officer:

1. Do you compliance policies for discipline give; treat everyone fair and consistent across the board – no matter the level of position?
2. With regards to your training and education, do you think you get a clear expectation in training?
3. Do you have a cost center?
4. How do you communicate your program? Do you have a newsletter? Is your picture up? Would people in your organization know where to go to talk to you? Recognize you? Post your picture and phone number throughout the organization.
5. Do you report to the CFO? Or the CEO? Do you have at least dotted line to BOD?
6. Do your training materials contain the 8 elements? Case scenarios? Risk areas in specific departments? Examples of FWA? Pre-test and post-test?

Finance: PFS Director/Controller/VP Finance

1. Explain the structure of the billing department.
2. Explain a billing event – how it works.
3. Tell me the flow of the bill.
4. Do you get rejections?
5. Do you have a policy on rejections and denied claims? **Decision tree?**
6. Do you self-disclose? Do you quantify? Broad scope – 3, 6 months?
7. If you detect fraud, how far do you go back to rectify?
8. What resources do you have to be updated with changes?
9. How are you made aware of changes to billing practices? Do you have regular meetings with staff?
10. Do you attend external speakers, webinars, etc?
11. How do you detect FWA?
12. Do you have edits in your system? 3 day hold?
13. Explain your internal controls in billing.
14. Do you choose a random sample yourself, to audit?

Human Resources: ‘Is a very integral part of compliance’

1. Do you have some kind of system in place to detect and deal with those employees that don’t complete annual training?
2. Do you check for excluded employees? How? How often?
3. How do you track your education requirement?
4. What about contracted employees?
5. Do you use a Pre & Post Assessment?
6. Do employees get a copy of the Code of Conduct?
7. What is the difference between retaliation and intimidation?
8. Do you verify certifications? Or just licensures?
9. What about excluded providers, do you know what it means?
10. Exit interviews: Is there a compliance question? Do you allow the CO to see the results or interview in addition to you? ‘This is a under utilized tool’ – Mitigate/Qui Tam
11. Do you know about the REID Institute/Program? Eye to left, lying-up, right -truth.
12. What do you think are the employee’s view of compliance? Are they aware? ‘Compliance awareness and training fosters behavior changes, opens transparency’
13. How do you track PE’s?
14. How do you rate Compliance Training here?
15. Has your organization ever disciplined anyone for retaliation or intimidation? (FSG)

‘Compliance offers a different set of eyes and training to be involved with investigations (Quality/Risk) and interviews. Corp Compliance should be notified and involved in an investigation. It touches everything’