Compliance Dashboards - Monitoring Effectiveness

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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
- Operational efficiency because tasks are better planned and coordinated
- Maximum flexibility - “Anticipatory”
- Participates with government regulators setting standards and policies

Evolving
- “React to fire” 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 towards 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.

Key Elements of an Effective Dashboard

- 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.

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
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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
<table>
<thead>
<tr>
<th>Key Dashboard Indicators</th>
<th>– New Programs</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Signed Acknowledgement Forms Submitted/Total Number of Employees</td>
<td></td>
</tr>
<tr>
<td>• General Training Completed/Total Number of Employees</td>
<td></td>
</tr>
<tr>
<td>• High Compliance Risk Training Completion/Total Universe Required</td>
<td></td>
</tr>
<tr>
<td>• LEIE Screening Completed at Time of Hire/New Hires during Period</td>
<td></td>
</tr>
<tr>
<td>• Provider Credentialing Completed/Number up for renewal</td>
<td></td>
</tr>
</tbody>
</table>

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<thead>
<tr>
<th>Key Dashboard Indicators</th>
<th>– New Programs</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Dept Submission of Compliance Work Plans/Total Number of Depts</td>
<td></td>
</tr>
<tr>
<td>• Conflict of Interest Statements Submitted/Universe Required</td>
<td></td>
</tr>
<tr>
<td>• Compliance Committee Meetings with Quorums/Total Compliance Committees</td>
<td></td>
</tr>
<tr>
<td>• HIPAA Breach Reports</td>
<td></td>
</tr>
</tbody>
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<th>Key Dashboard Indicators</th>
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<tbody>
<tr>
<td>• Signed Acknowledgement Forms Submitted/Total New Employees</td>
<td></td>
</tr>
<tr>
<td>• General Compliance Training Completed for Current Year/Total Employees</td>
<td></td>
</tr>
<tr>
<td>• LEIE Ongoing Screening Completed per Reporting Period/Universe of those Required</td>
<td></td>
</tr>
<tr>
<td>• Provider Credentialing</td>
<td></td>
</tr>
</tbody>
</table>
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

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