

Analytics: Enhancing Your Hospital Compliance Program

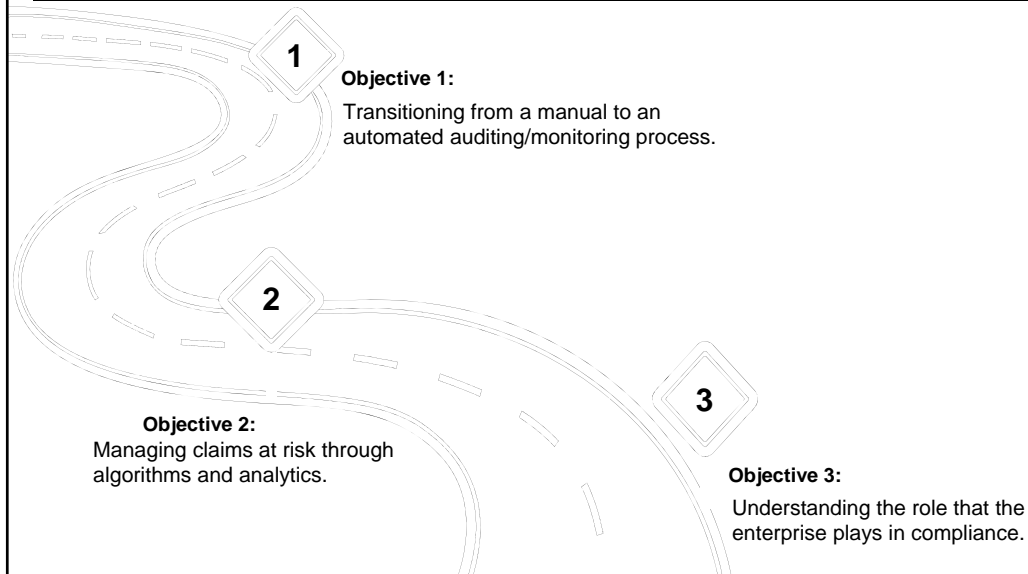


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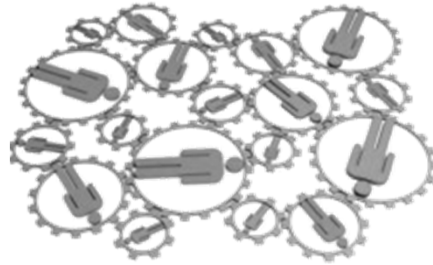
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Today's Session



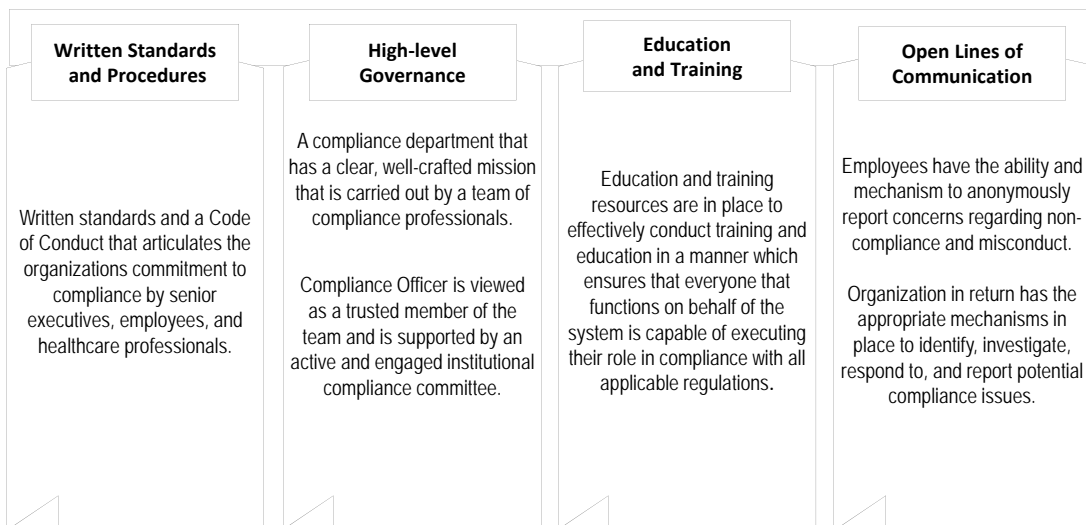
Polling Question: What is Your Role in Compliance?

- A. Compliance Officer
- B. Legal Counsel
- C. Compliance Administrator/Specialist
- D. Billing/ Coding Compliance
- E. Other



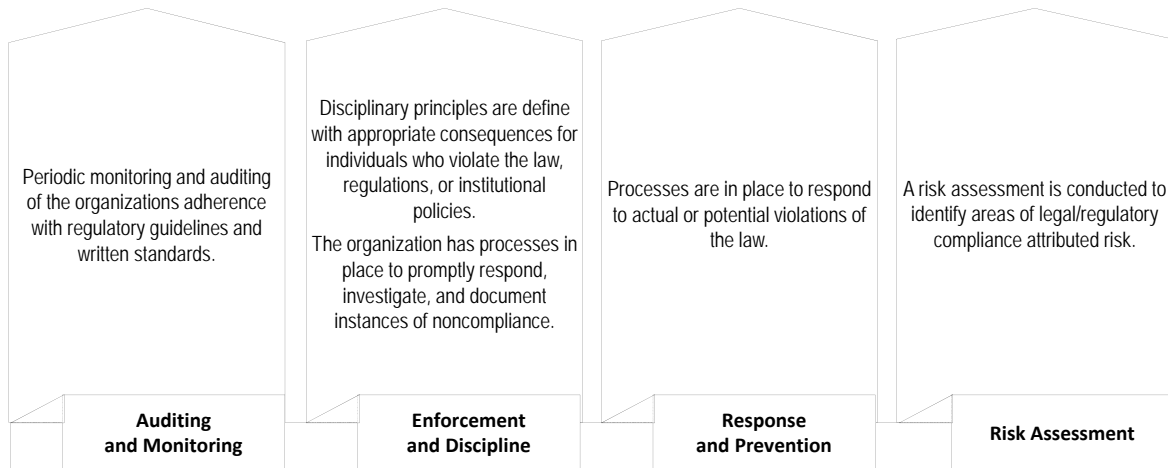
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Compliance: Roles and Responsibilities



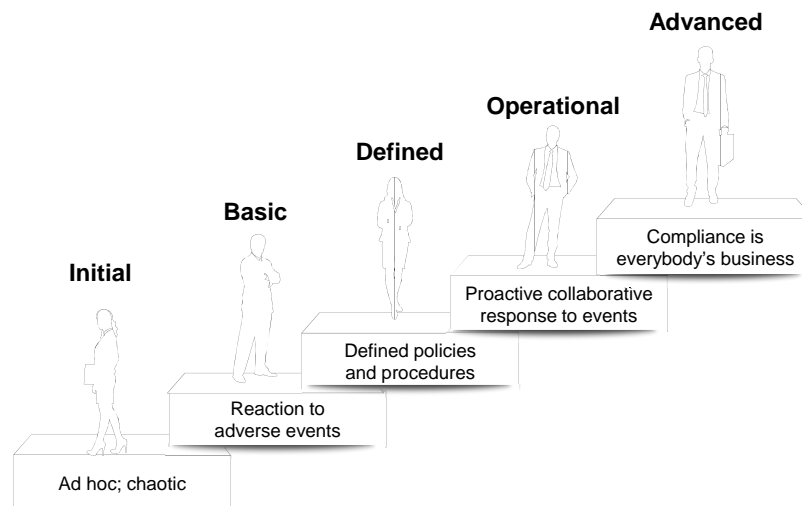
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Roles and Responsibilities (continued)



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Optimizing Resources: Program Maturity



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Polling Question: Organization Compliance Program Maturity

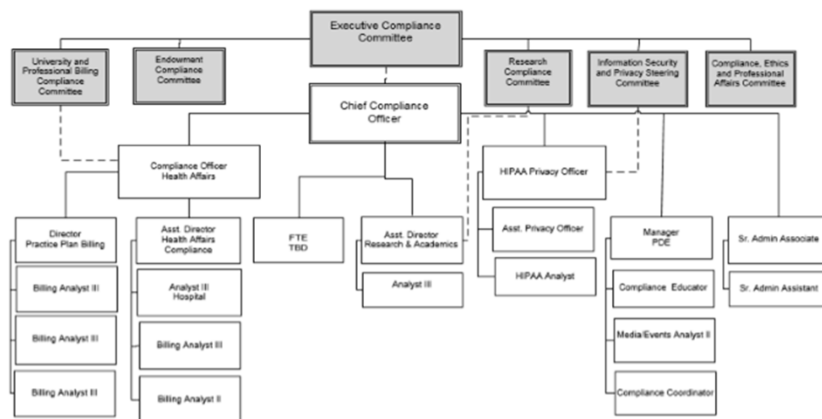
Compliance Program:

- A. Ad Hoc
- B. Fragmented
- C. Defined
- D. Operational
- E. Advanced



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Compliance Program Infrastructure

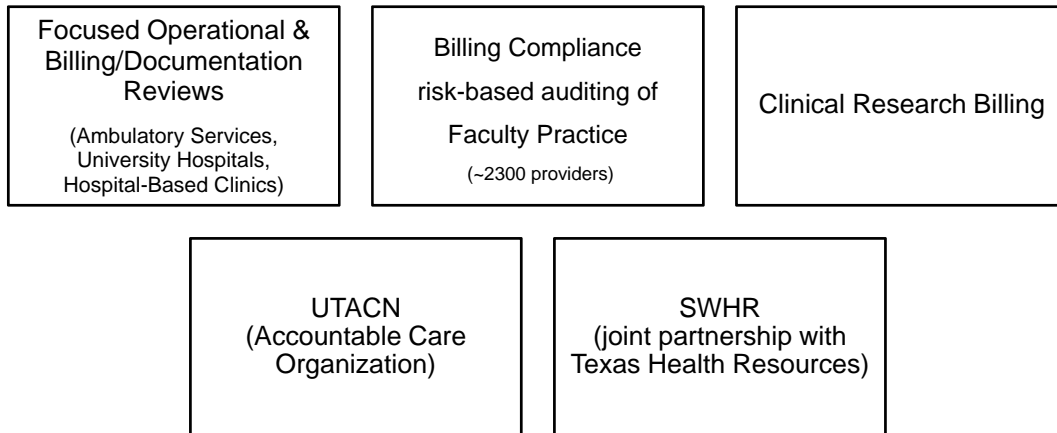


Office of Compliance Org Chart
FY16 FTE = 22

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Program Responsibility: Health System Compliance

Compliance program monitoring and advisory engagement includes:



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Compliance: Auditing and Monitoring

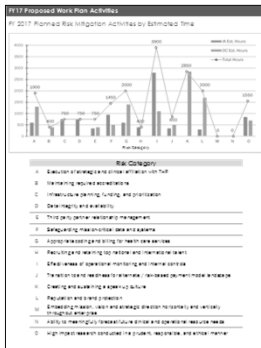
Element of an effective compliance program is to conduct periodic auditing and monitoring of the organization's adherence with regulatory guidance and established written standards.

Audit and Review Types:

Baseline	• High level review
Probe	• Determine whether a compliance issue exists
Routine	• Evaluate ongoing compliance
Expanded	• Enlarge sample based on error rates identified during a routine audit
Focused	• For cause review

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Risk Identification: Organizational Strategic Initiatives



Work Plan			
Work Plan	Target	Priority	Measure of Success
Identify a common goal and develop a strategic plan, including a timeline for implementation and a budget.	Quarter 1	High	Completion of the plan by the end of the quarter.
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Auditing and Monitoring: Compliance Risk Areas

- Inpatient Rehabilitation Facility
- Cochlear Implants: Recalls
- Bariatric Surgery
- Overlapping Surgeries
- High Dollar Chemotherapy Drugs
- Sleep Testing
- Major Joint Replacements: Hip and Knee
- Hyperbaric Oxygen Therapy and Skin Substitutes
- Short Stays: 2 Midnight Rule



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Polling Question: Does your facility use analytical software to conduct compliance reviews/audits?

A. Yes

B. No



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Compliance Monitoring: Manual Process

- Identifying most recent claims
- Risk universe
- Gross charges vs. net charges
- Claim reports (4 systems) prior to centralization
- Manual Spreadsheet
- Reporting
- Audit Retention



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Auditing: Trust But Verify



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Using Analytics: Risk-Based Auditing

Product: **Revenue Integrity** | Units: | Monitor: | Audit: | Explore: | Forecast:

Home Audit Hospital

Audit Info:

Auditor:

Audit Type:

Letter Number:

Audit Letter Date:

Reason for Audit:

Attachments:

Claims by:

Account #	MRN #	Policy ID #
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		

+ Add Rows

Validate

Top 6mo Short Stay Risk Trend

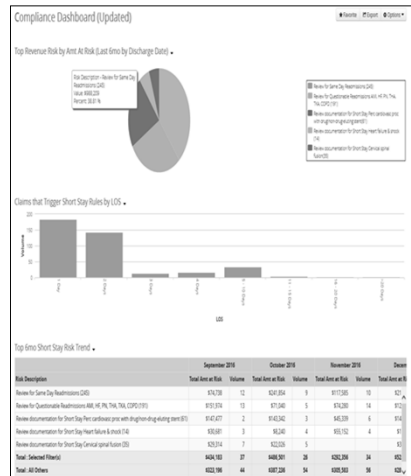
Risk Description	September 2016		October 2016	
	Total Amt at Risk	Volume	Total Amt at Risk	Volume
Review for Same Day Readmissions (SQR)	\$14,738	12	\$24,854	9
Review for Questionable Readmissions (RR, PE, PA, TPA, TPA, CPOD (191))	\$151,874	13	\$71,040	5
Review documentation for Short Stay (Per cardiac prec with drug-on-drug alerting alert (B1))	\$147,477	2	\$143,342	3
Review documentation for Short Stay (Heart Failure & shock (14))	\$30,681	3	\$8,240	4
Review documentation for Short Stay (Cervical spinal fusion (33))	\$23,314	7	\$22,026	5
Total - Selected Filters	\$424,183	37	\$408,501	26
Total - All Others	\$523,196	44	\$387,238	54

837-Primary Payer

Primary Payer	Claims	% of Claims	ALOS	Utilizer Op Days	Total Charges	Arg Charges	Total Pmts	Arg Pmts	Total Amt at Risk
NONE	5	0.0%	4.0	1.5	\$134,864	\$25,972	\$1,632	\$25	\$0
Commercial/Other	1,341,116	\$2,226	5.6	112,019	\$1,667,447,010	\$5,717	\$2,940,885,195	\$2,195	\$407,820,234
Medicaid	21,520	0.04%	6.7	8,897	\$24,201,824	\$13,689	\$26,986,385	\$1,254	\$1,644,648
Medicare-Adv	42,940	1.71%	5.4	12,873	\$18,983,372	\$8,878	\$12,279,058	\$1,192	\$24,225,165
Medicare	1,325,480	39.99%	6.3	147,419	\$1,637,547,475	\$7,480	\$1,255,595,957	\$1,223	\$55,862,481
Medicare-Adv	126,994	4.94%	6.6	22,157	\$124,638,418	\$7,286	\$10,074,102	\$1,285	\$56,873,521
Unassigned	6,822	0.23%	6.6	1,763	\$82,378,198	\$12,081	\$18,987,388	\$2,819	\$6,485,612
Total - All	2,346,491	100.00%	6.3	289,818	\$17,814,418,360	\$6,629	\$4,488,622,447	\$1,738	\$158,378,881

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Reporting: Compliance Dashboards



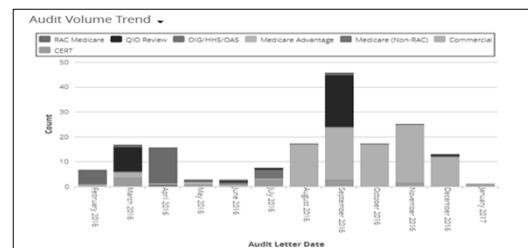
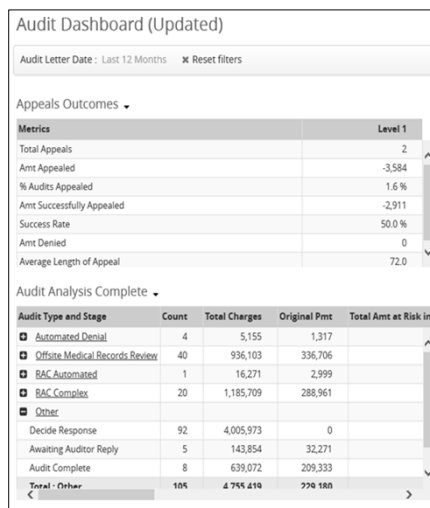
System Dashboard Users:

- UH Leadership (CFO, COO)
- Compliance
- Internal Audit
- Utilization Review
- Decision Support
- Revenue Integrity
- Denials
- Coding and CDI
- Revenue Cycle Operations

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Reporting: External Audit Dashboards



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Stakeholder Engagement: Advocating Change



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Compliance Program: Mission, Vision and Value

Each day our patients, students, and the public count on us to deliver the very best in patient care, state-of-the-art research, and outstanding medical education. As a University, we strive to meet and exceed these goals. By fostering a culture of compliance with established policies and standards, we reassure the community of our commitment to adhering to all applicable laws, rules, and policies.

Daniel K. Podolsky, M.D.
President, UT Southwestern Medical Center

Source: UT Southwestern Medical Center, Standards of Conduct (2013)

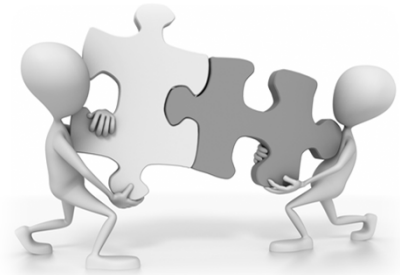
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Rules of Engagement: Executive Trust

- Finding ways to connect with the CEO, CFO, COO and CNO
 - Tone at the Top: Culture of Ethics and Compliance
 - Executive Leadership Team Compliance Rounding
 - Executive Leadership Team- Dedicated Quarterly Meetings for Compliance
 - Meaningful Data: Compliance Dashboards, Real-time Auditing and Monitoring

- Compliance - Valued Addition to Operations
 - Accreditation and Patient Safety
 - Revenue Cycle Operations (HB and PB)
 - Clinical Research
 - Hospital and Ambulatory Services-Operations



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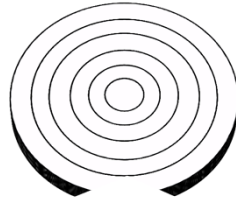
Compliance: The Change Agent



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Understanding the Marriage: Operations vs. Compliance

Compliance



Operations

Risk Mitigation

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Rules of Engagement: Collaboration and Transparency

- Culture: Embedding a “just culture mindset” is key.
- Communication: clear, concise and engaging discussions regarding strategic initiatives, organizational risks (appetites) and risk mitigation.
- Cross-Functional Risk-Management Approach: Eliminating silos and amplifying change agent teams to mitigate risk.
- Report, Report, Report: Establish KPIs and benchmark against organizations and other academic medical centers.
- Continuous Process Improvement: Plan, Do, Study, Act



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