



Back from the Brink: Transforming a Psychiatric Rehabilitation Program on the Heels of a Self-Report

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► This presentation is not representative of legal advice or opinion, if you should encounter a similar situation as outlined in this presentation, you're advised to reach out to your legal counsel for consult in the self-reporting process.

Presentation Overview

- The psychology of self-reporting: how to navigate your autonomic nervous system's flight, "fight" or freeze responses. It takes a village—and a detailed work plan:
- Using an integrated Compliance-Quality Management framework to systematically develop and implement an improvement work plan and meet performance requirements in the context of limited organizational resources.
- Sustaining the Improvements: Proven QPM methods for securing the improvements, continued attention to workforce transformation and the critical nature of communication and collaboration with external administrative entities.

Uncovering the Issues

- ▶ Priority Programs from the Organization Risk Assessment
- ▶ Licensure by regulatory oversight entity
- ▶ Re-credentialing by MCO
- ▶ Internal Self-Audit

Internal Self-Audit

- ▶ The internal audit was conducted prior to the annual licensing visit with the intent of:
 - ▶ Fulfilling assessment of those programs identified as being 'high risk' as indicated on the organization risk assessment
 - ▶ To assess programmatic due-diligence in preparation for an external audit

Internal Self-Audit continued

- ▶ Probe
- ▶ Larger Sample Size
 - ▶ Decision points included looking at the sample assessed to determine if reimbursement to the funder is needed based upon an identified overpayment versus;
 - ▶ Looking at the sample assessed to determine pervasiveness of non-compliances that are directly related to reimbursement

Initiation of the Self-Report Process

- ▶ Self-reporting process commenced with the funding sources after findings of the internal audit were founded to be in alignment with the self-reporting criterion for providers
 - ▶ It is recommended that legal counsel be consulted at the onset of the self-reporting process
 - ▶ Understanding risk of self-report- there is an obligation to act as a compliance professional when such findings are of note;
 - ▶ In good faith reporting as part of organizational due-diligence and transparency there is often lesser penalties

Organizational Benefits

- ▶ Global assessment of program and other like programs in order to assess/address-
 - ▶ Cultural issues in addition to regulatory indicators for an overall programmatic assessment

Challenges

- ▶ Organizational Culture
 - ▶ Fight
 - ▶ Flight
 - ▶ Freeze
- ▶ Uncharted Waters
- ▶ Limited Resources

Integrated Framework

- ▶ Compliance and Quality
 - ▶ Detailed Improvement Plan and Associated Work plan
- ▶ Communication
 - ▶ External
 - ▶ Internal
 - ▶ Weekly Check-ins
 - ▶ Regular Reporting
- ▶ Workforce development and Transformation

Sample Work Plan

Major Action Step	Find and Correct	Date Due	Date Completed	Form	Revision	Date Due	Date Completed	System	Revision	Date Due	Date Completed	Lead Staff Responsible	Start Date	Planned End Date	Evidence of Completion

Presentation Recap

- ▶ Doing your organizational due diligence prior to someone else doing it for you
- ▶ Transparency with external entities in a good faith effort leads to lesser penalty
- ▶ Changing culture takes time and persistence
- ▶ Corrective actions need to be actively managed for the long term

QUESTIONS?

CONTACT INFORMATION

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