

Root Cause Q&A: Complete and Consistent Resolution of Issues Causing Compliance Concerns

Erin K. Heckethorn
Director of Compliance

FirstCarolinaCare Insurance Company

FirstCarolinaCare Insurance Company (FCC)

- Located in Pinehurst, NC
- Subsidiary of FirstHealth of the Carolinas
 - FH is a central NC Regional Health System
- FCC Lines of Business:
 - Commercial – HMO/POS since 2001 ; PPO since 2007
Appx. 18,000 lives
 - Medicare Advantage – HMO and PPO since 2013
Appx. 6500 lives

FirstCarolinaCare Insurance Company (FCC)

What Hurdles have we overcome?

FCC Leadership Changes: Operations, Pharmacy, Compliance & Executive

Vendors contracted in last 4 years:

- 2 Claims TPAs + 1 new (2017) TPA partner (all MAPD)
- 1 PBM implementation (MAPD)
- 8 additional new FDRs (MAPD)

Took back from Delegates:

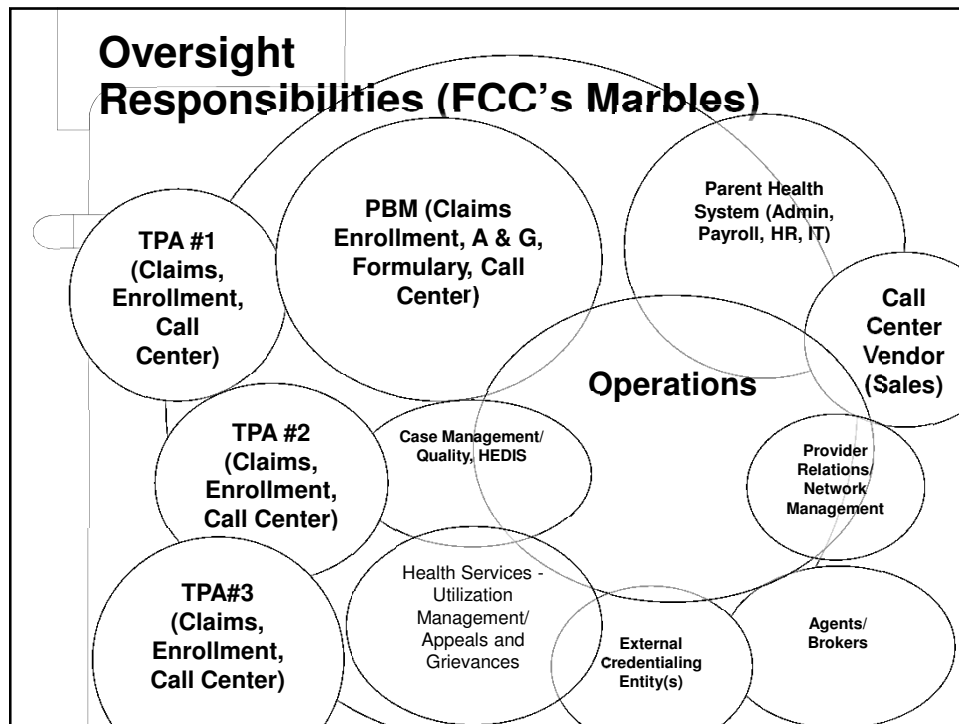
- Agent oversight from GA - increased 3x our appointed agents
- Health Services – Pre Service, Appeals and Grievances

MAPD SAE from 6 to 7 Counties, then to 14 Counties

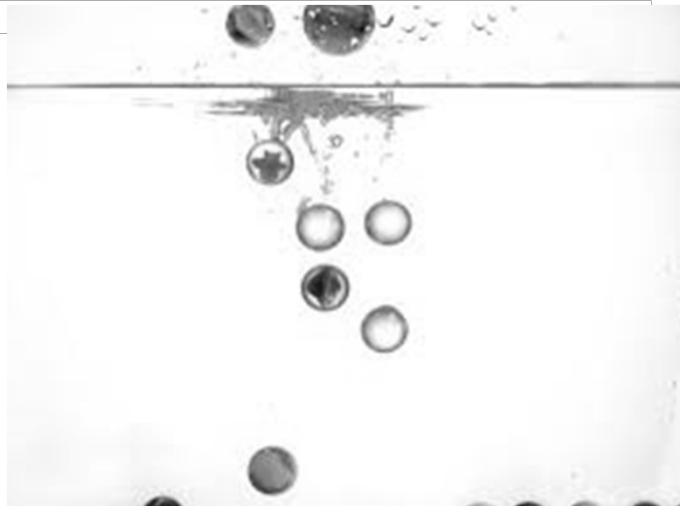
CMS Program Audit – September/October 2016

Managing to keep your marbles on the table...





Managing to keep your marbles on the table... without any **FALLING OFF!!**



MAPD and Commercial Compliance 101 – May 2013 to January 2017

- New Partnerships with vendors
- New Providers/Service Areas
- New FCC Leadership team members
(including Compliance Officer)
- Changes in Regional Office Account Mgrs.
- CMS Program Audit

NONC and Issue Response Tool

- Issue – Description of non-compliance
- Impact - Beneficiary Impact (i.e. # affected)
 - Impact of issue in other ways/forms
- Root Cause – Why did it happen?
- Correction – Short Term and Long Term:
 - Process to fix
 - Implementation date
 - Measurement
 - Monitoring

Root Cause Q&A – English 101

The questions everyone asks...

Who was involved?

What Happened?

When did it happen?

Where was the failure?

Why did the failure occur?

How can we fix this?

What timeframe will it take to resolve?

Root Cause Q&A Math & Science 101

HYPOTHESIS:

Y caused X

PROOF:

Does the outcome prove the theory?

NO –

Revised Hypothesis:

Z caused Y to cause X

Yes

Does Y's performance without Z impact cause X?

NO - Therefore, Z caused Y to perform improperly, causing X.

Root Cause Q&A – Reaching the TRUTH

How to know when you have reached the real root cause?



- keep digging, you'll get there!

Root Cause Q & A

The additional questions you should be asking when conducting a Root Cause Analysis...

What ELSE Happened?

Why did that happen?

In addition to that, What ELSE happened?

And what did that affect?

Why did that happen?

...and why did that happen?

Why was that the outcome?

Why?

Why?

Why?



Root Cause Q&A – & After the Q&A



Keep Digging, You'll Get There!!

- What ELSE Happened?
- And then what?
- Why did that happen?
- Why did THAT happen?
- What caused that to happen?

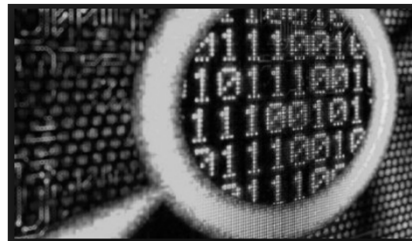
Root Cause Q&A

What do you do with all of this information?

Each Original "WHY" becomes it's own Investigation or "Why Chain"...

Avoiding

Cognitive Bias



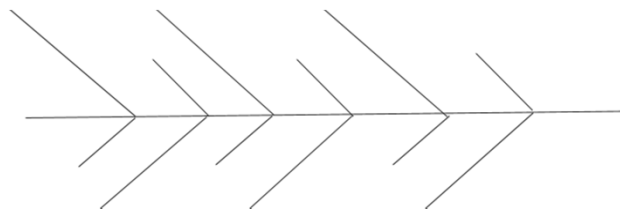
Root Cause Q&A - Say "NO" to Cognitive Bias

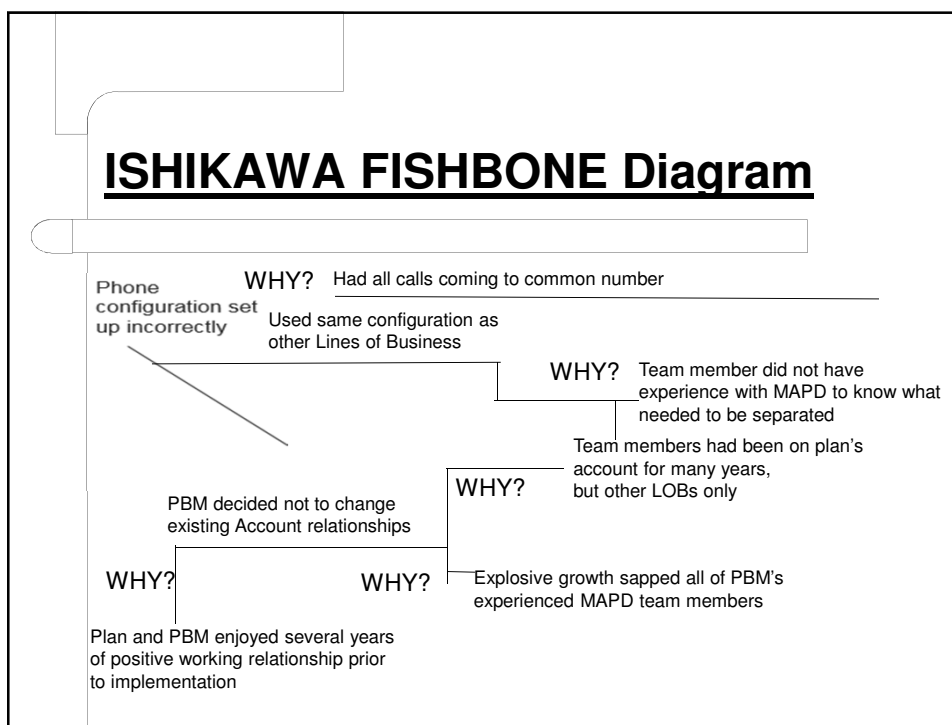
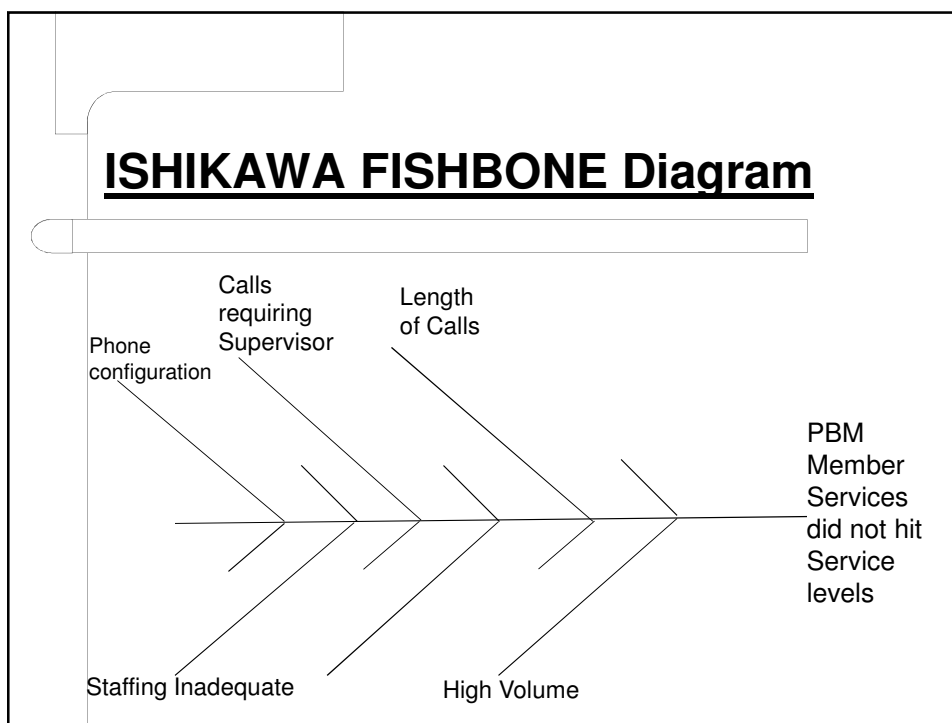
What do you do with all of this information?

How to start a Why Chain:

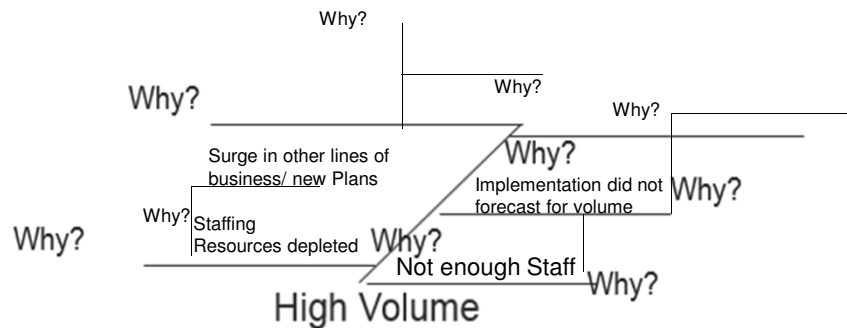
One approach: Take the answer to a "Why" and apply to an

ISHIKAWA FISHBONE Diagram





ISHIKAWA FISHBONE Diagram



Root Cause Q&A – Going Beyond “WHY”

Trending your “Why Chains”:

- XXX team “did not know...”
- XXX team “Missed during review...”
- XXX “Team member was out...”
- XXX team “Was misinformed...”

Look for “Why Chain Tunnels”:

- Lack of Resources
- Lack of Training
- Lack of Staff
- Lack of Knowledge
- Lack of Experience

Root Cause Q&A

How do you get all of these different vendors, departments, entities, Parent Orgs, etc. to provide you with what you need in order to document and fix the problem??

How do you get the Subject matter Experts from different entities to agree on what the real root cause is?

How do you get Department Heads and Leadership to keep pressing their team for more answers?

How do you instill a "Don't settle" mentality to allow pursuit of the REAL Root Cause?

Root Cause Q & A

Effective Corrective Action Plans Will Fix Future Problems Before they Exist!!

BUY IN Requires Investment – Educate your Leadership AND Peers...

1. **Bone up on other Quality Tool Resources - e.g. Other Baldrige or Six Sigma Tools – Make it a part of COMPLIANCE WEEK activities!**
2. **TEACH your own staff, as well as peers and Subject Matter Experts in Key Departments on the benefits of documenting the "Why Chain"**
3. **Start at the TOP – Use time during Executive meetings to engage team in Compliance Concepts**
4. **Use Relatable Examples: If you "KEEP Digging, You'll Get There"**
 - Find Unique ways to document your "Why Chain"
5. **Most importantly, EDUCATE your Team!!**

Effective Corrective Action Plans

Effective Corrective Action Plans Will Fix Future Problems Before they Exist!!

1. Solve the immediate issue, but **DON'T FORGET** about the **LONG TERM**
2. Look at the root causes from your Why Chains
 - Provide a Corrective action for **EACH ONE** of the Root Causes
3. Evaluate your Correction to ensure it addresses the offending Root Cause
4. Forecast outcomes:
 - Does this CAP Outcome change the course of other areas?
 - Is this CAP Sustainable?

Measuring and Monitoring

Measuring and monitoring

– “You mean they are not the same thing?”

Measuring = What are the Results you will expect to see *that indicate* the CAP is working/effective?

Monitoring = How will you Review Results to determine the CAP is working/effective?

Measuring and Monitoring

Avoid the black hole of monitoring without a plan for closure



Root Cause Q&A

Questions?

FirstCarolinaCare Compliance

Thank you!

Erin K. Heckethorn
Director of Compliance
FirstCarolinaCare Insurance Company
eheckethorn@firstcarolinacare.com

Resources:

ISHIKAWA's FISHBONE

Ishikawa, Kaoru. Guide to Quality Control, Tokyo: Asian Productivity Organization, 1986

The Undoing Project: A Friendship that Changed our Minds pub. Norton & Company, Lewis, Michael c. 2017

MoneyBall: The Art of Winning an Unfair Game pub. Norton Paperback, Lewis, Michael c. 2004

Black Hole Image:

<http://www.universetoday.com/14068/what-is-on-the-other-side-of-a-black-hole/>

Image for Baby Press and Investigative Research:

<https://www.google.com/webhp?sourceid=chrome-instant&ion=1&espv=2&ie=UTF-8#q=Investigative+research+images>