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Leveraging Data to Improve Your Compliance Program

January 18, 2018
HCCA Regional Conference – Charlotte, NC

One

Session Objectives

- Discuss why data is critical to today's compliance program
  - What data is available?
  - How are regulators using **our** data?
- Provide examples of how to utilize data to conduct compliance activities and to illustrate compliance program effectiveness
- Review suggested steps for Compliance Officers to improve how data is integrated into their Compliance Program
- Cautionary remarks

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Why is data critical to today's compliance program?

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WHY Data?

Regulators are using YOUR data
HOW?
- PEPPER
- Quality – payment
- Commercial partnership with CMS
- Compare organizations to identify audit targets
- Available tools allow for reviewing ALL data

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PEPPER — Program for Evaluating Payment Patterns Electronic Report

Why is CMS Providing PEPPER?

- CMS is tasked with protecting the Medicare Trust Fund from fraud, waste and abuse.
- The provision of PEPPER supports CMS' program integrity activities.
- PEPPER is an educational tool that is intended to help providers assess their risk for improper Medicare payments and support their auditing and monitoring activities.

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Source: PepperResources.org
Chapter 1 – What is PEPPER? Introduction and History

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PEPPER — Program for Evaluating Payment Patterns Electronic Report

Why Should You Be Interested?

- Providers are under focus:
  - Office of Inspector General Work Plan
  - Recovery Auditors, Medicare Administrative Contractors, Supplemental Medical Review Contractors, etc.
- Would you like to know if your statistics might be a **red flag** to auditors?

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Source: PepperResources.org
Chapter 1 – What is PEPPER? Introduction and History

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WHY Data?

- **Regulators are using YOUR data**
- **Examine ALL records or transactions**
- **Efficient use of team resources**
- **Repeatable process** (with minimal additional resources)

Deploy the proper tools and resources to answer your compliance questions

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Note about Big Data

Big Data

2001, industry analyst Doug Laney described the "3Vs"
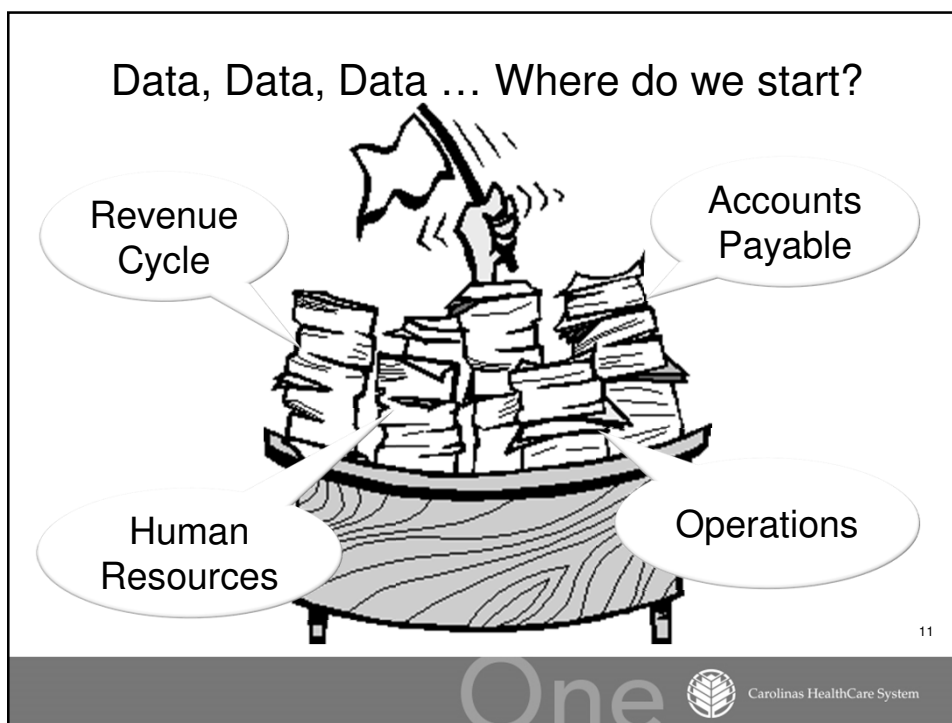volume, variety, and velocity

- **Volume – the amount of data**
- **Variety – the number of types of data**
- **Velocity – the speed of data processing**

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1/12/2018

Data, Data, Data … Where do we start?

Revenue Cycle

Accounts Payable

Human Resources

Operations

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Data, Data, Data

Revenue Cycle
- Medical Record (e.g. Cerner)
  - Ancillary systems (e.g. Omnicell)
- Accounts Receivable (e.g. EPIC)
- Claims (ANSI 837)
- Remittance (ANSI 835)

Accounts Payable
- Purchasing/Vendor Payments (e.g. PeopleSoft)
- Employee Reimbursement
- Provider Reimbursement

Human Resources
- Payroll
- Time Keeping (e.g. Kronos)

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Data, Data, Data

Operations

- Inventory Management
- Clinical
  - Electronic Medical Record
  - Medication management
  - Radiology
  - Surgery, etc.
- Compliance
  - Conflict of Interest
  - Audits & Investigations

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Tools & Resources

Tools

- Analytic-Centric Applications
  - SAS
  - Internal Audit – ACL, IDEA, Arbutus
- Custom Applications
  - SQL
  - R
  - Python
- Data Visualization
  - Tableau
  - PowerBI

acl S.sas

IDEA
Data Analysis Software

ARBUTUS

python

R

tableau

Power BI

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Tools & Resources

Resources

- Information Systems department
- Decision Support Services
- Dedicated teammate(s)
- External

Be creative in developing resources … you too can have a comprehensive compliance data program.

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Dig This Way?

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Or Dig This Way?

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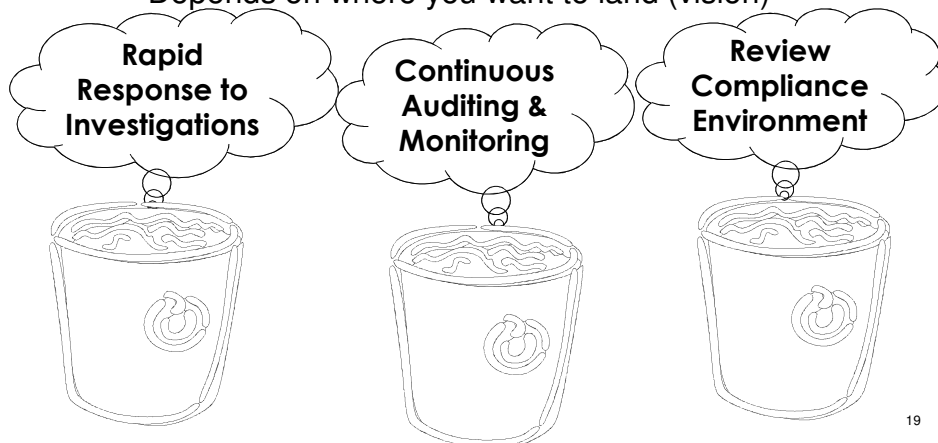## Integrating data into YOUR Compliance Program

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Create a Compliance Data Program

Where Do I Start?

Depends on where you want to land (vision)

Rapid Response to Investigations

Continuous Auditing & Monitoring

Review Compliance Environment

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Create a Compliance Data Program

Example: Repeat the same audits each quarter
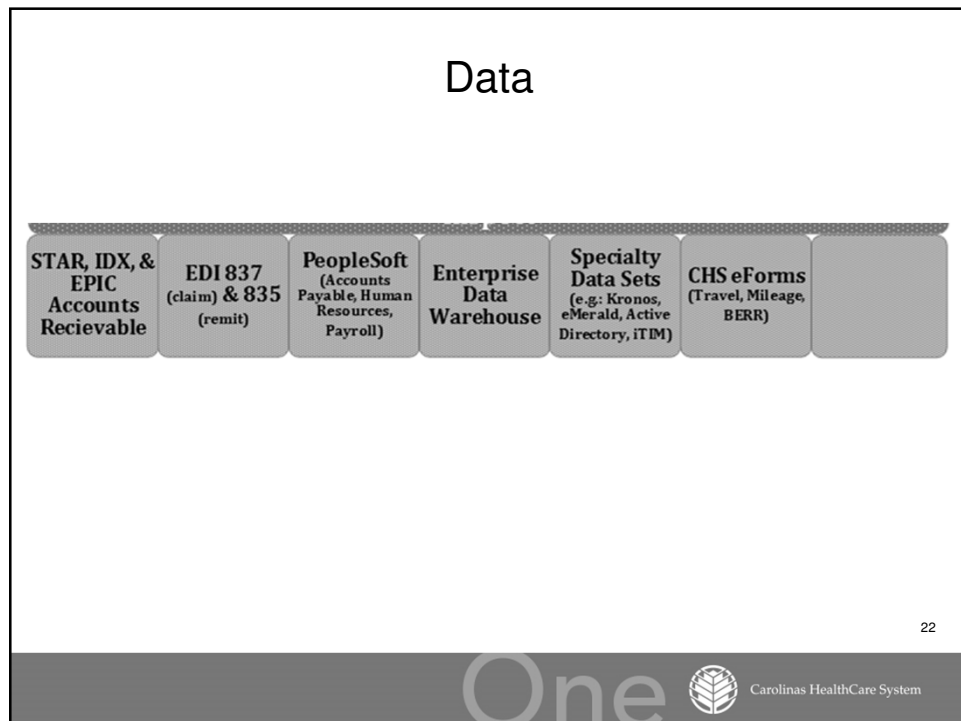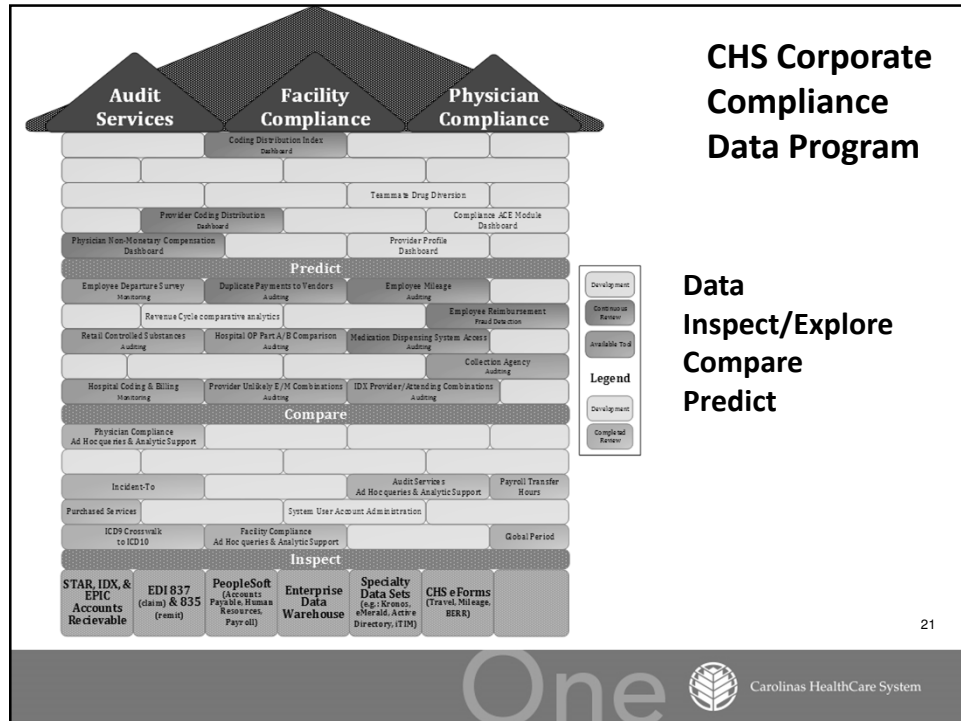(continuous auditing)

1. Identify recurring themes or trends from your current compliance audit plan/program
2. Risk-rank or prioritize compliance questions you would like to review again
3. Clearly define your compliance question(s) you want to answer.
4. Identify the tools and resources needed to replicate those projects
5. Plan, design, build, execute

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Slide 21

CHS Corporate Compliance Data Program

Audit Services | **Facility Compliance** | **Physician Compliance**

Coding Distribution Index Dashboard

Teammate Drug Diversion

Provider Coding Distribution Dashboard

Compliance ACE Module Dashboard

Physician Non-Monetary Compensation Dashboard

Provider Profile Dashboard

Predict

Employee Departure Survey Monitoring | Duplicate Payments to Vendors Auditing | Employee Mileage Auditing

Revenue Cycle comparative analytics

Employee Reimbursement Fraud Detection

Retail Controlled Substances Auditing | Hospital OP Part A/B Comparison Auditing | Medication Dispensing System Access Auditing

Collection Agency Auditing

Hospital Coding & Billing Monitoring | Provider Unlikely E/M Combinations Auditing | IDX Provider/Attending Combinations Auditing

Compare

Physician Compliance Ad Hoc queries & Analytic Support

Incident-To | Audit Services Ad Hoc queries & Analytic Support | Payroll Transfer Hours

Purchased Services | System User Account Administration

ICD9 Crosswalk to ICD10 | Facility Compliance Ad Hoc queries & Analytic Support | Global Period

Inspect

| STAR, IDX, & EPIC Accounts Recievable | EDI 837 (claim) & 835 (remit) | PeopleSoft (Accounts Payable, Human Resources, Payroll) | Enterprise Data Warehouse | Specialty Data Sets (e.g.: Kronos, eMerald, Active Directory, iTIM) | CHS eForms (Travel, Mileage, BERR) |

Legend: Development, Continuous Review, Available Tool, Development, Completed Review

Data
Inspect/Explore
Compare
Predict

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Slide 22

Data

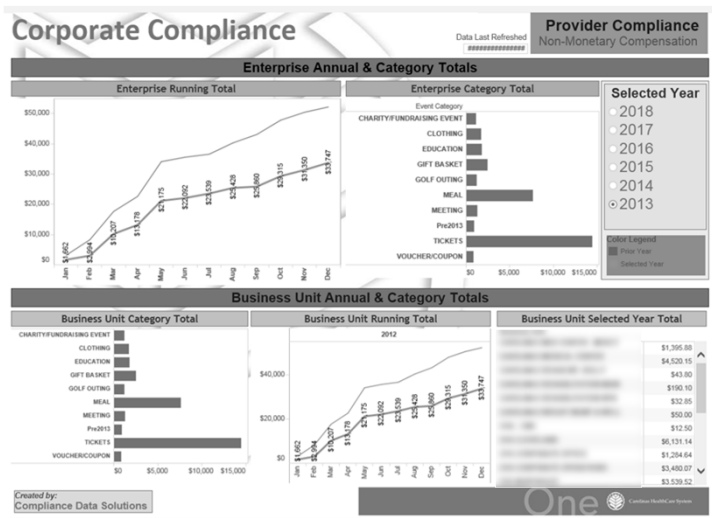| STAR, IDX, & EPIC Accounts Recievable | EDI 837 (claim) & 835 (remit) | PeopleSoft (Accounts Payable, Human Resources, Payroll) | Enterprise Data Warehouse | Specialty Data Sets (e.g.: Kronos, eMerald, Active Directory, iTIM) | CHS eForms (Travel, Mileage, BERR) |

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Utilizing data to conduct compliance activities and illustrate compliance program effectiveness
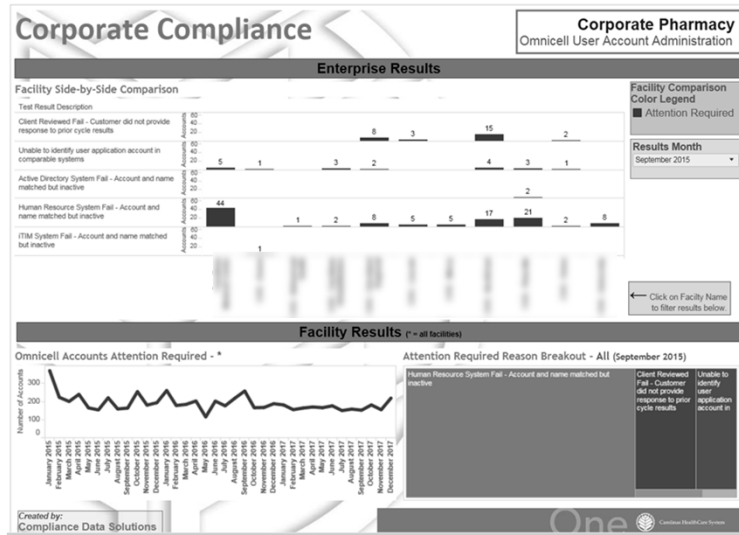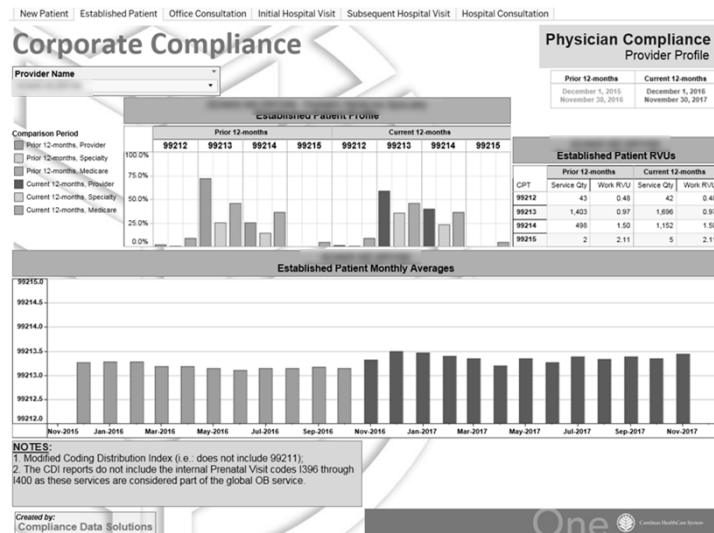
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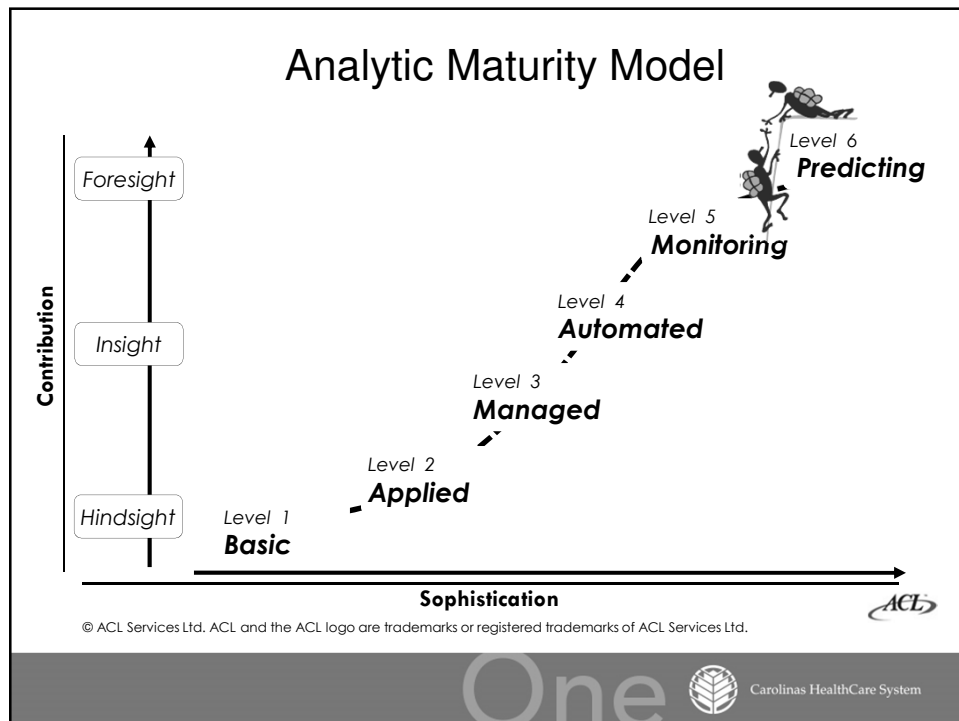Provider Non-Monetary Compensation

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Medication Management

Provider Profile

Coding Distribution Index

Analytic Maturity Model

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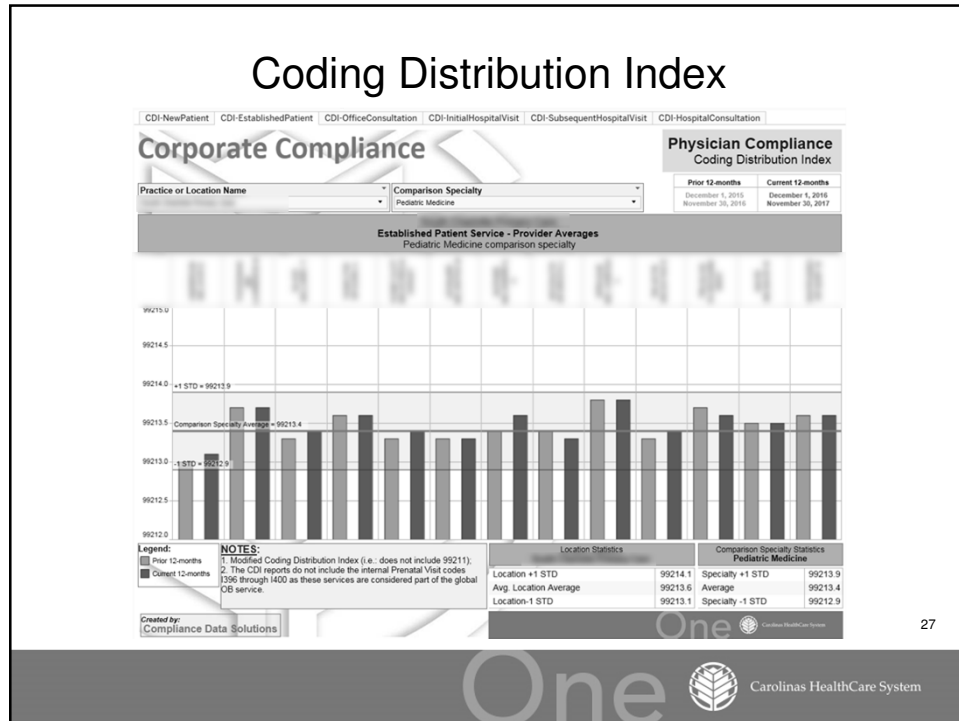
Analytic Maturity Model

☐ **Basic** – ad-hoc analysis conducted by team member(s) with introductory training

☐ **Applied** – project planning takes analytics into account

☐ **Managed** – People, processes, and technology in place to manage analytic activities

☐ **Automated** – Comprehensive tests developed; Data access is secure but accessible; Scheduled analytics.

☐ **Monitoring** – Used in annual planning; Compliance issue activity trending

☐ **Predicting** – Analytic results influence/guide compliance project planning

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Thoughts on Data and Compliance Program Effectiveness

Formalize your data program by defining it

– What teammate resources are responsible for initiating & completing projects?

– Is your data program responsible for specific projects?

– What process is required to initiate a new data project?

– How does your data program integrate with other compliance activities?

Compliance drives the project

– Create clear compliance questions

– Be creative in "how" data is used

– "We can't do that" – challenge that answer

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CAUTION!

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Caution!

- Plan your strategy
- Know what "should be" in the data (completeness)
- Relationship with data team
- Data are facts – Analysis is a composition of facts leading you to an opinion
- Data is a tool not the answer
- Lack of understanding how data "flows" can result in incorrect opinions
- Clearly define your compliance question

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Does X really mark the spot?

Clearly define <u>where</u> you should dig

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Questions

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