

Carolinas HealthCare System

## Leveraging Data to Improve Your Compliance Program

January 18, 2018  
HCCA Regional Conference – Charlotte, NC

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### 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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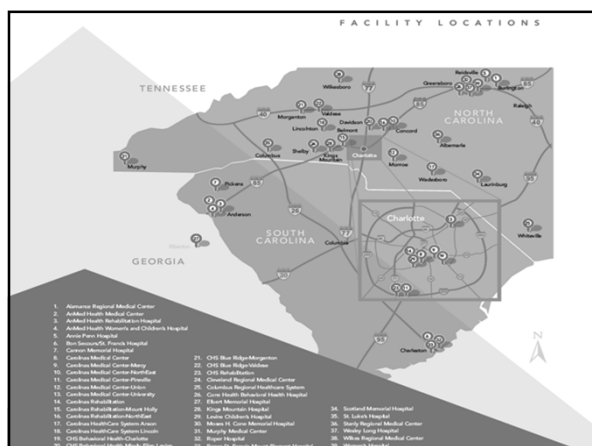
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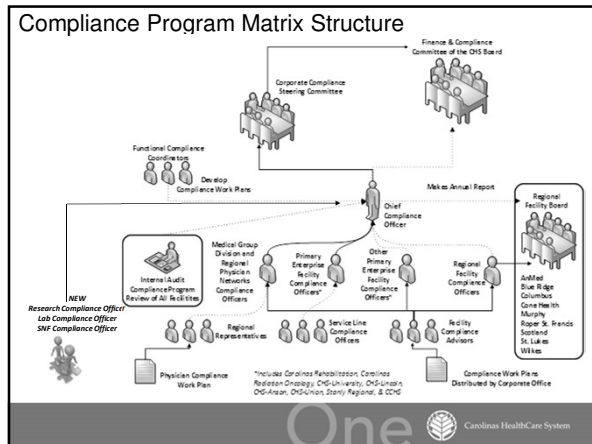
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## Why is data critical to today's compliance program?



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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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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.

Source: [PepperResources.org](http://PepperResources.org)  
 Chapter 1 – What is PEPPER? Introduction and History

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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?

Source: [PepperResources.org](http://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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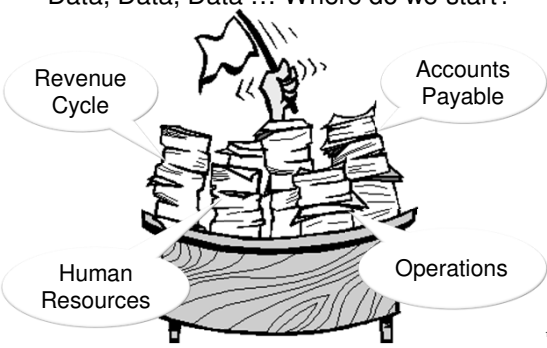
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### Data, Data, Data ... Where do we start?



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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

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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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**Utilizing data to conduct  
compliance activities and illustrate  
compliance program effectiveness**

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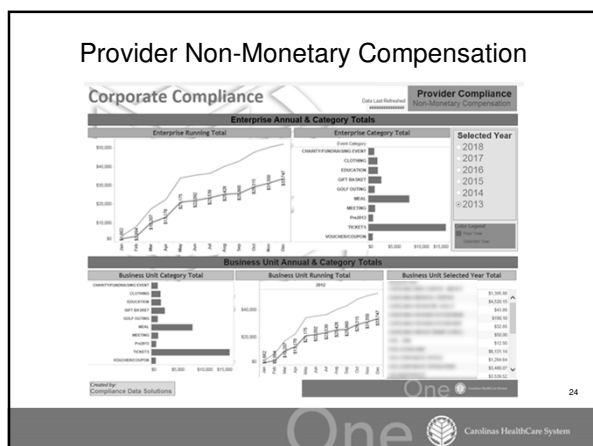
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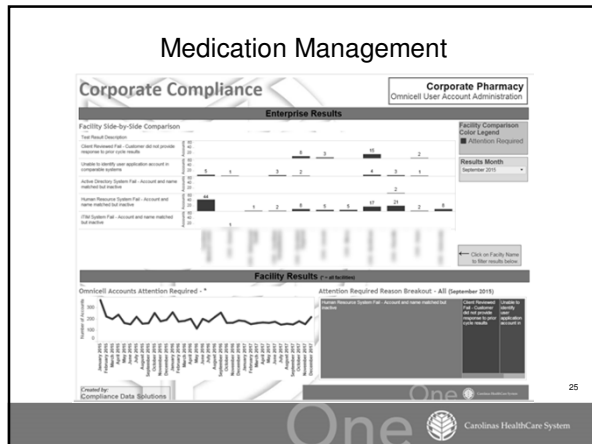
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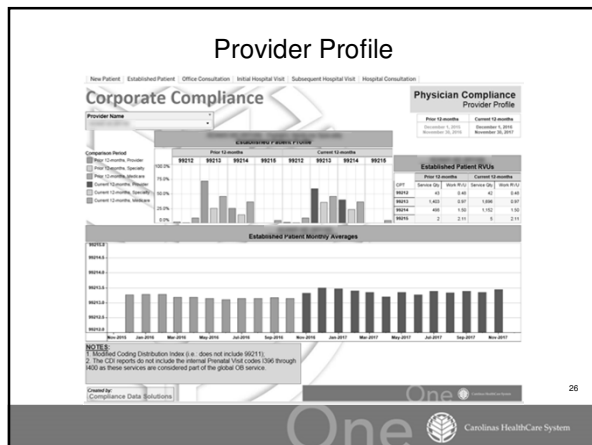
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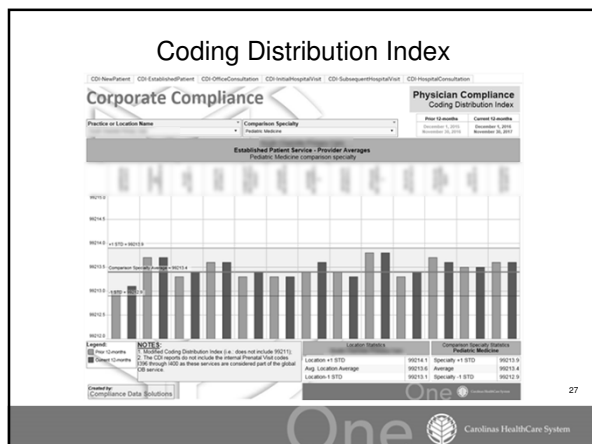
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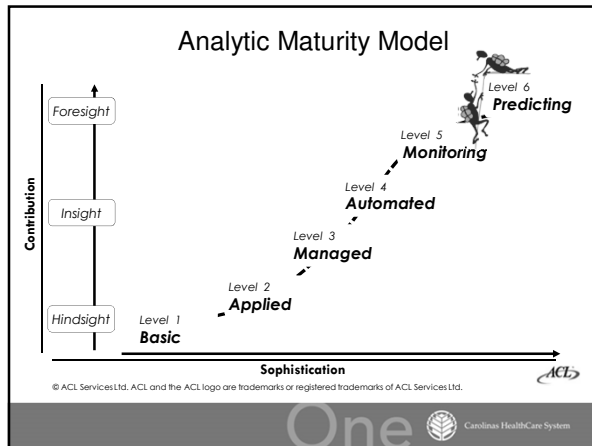
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### Analytic Maturity Model

- ☐ **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 where you should dig



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- Provide examples of how to utilize data to conduct compliance activities and to illustrate compliance program effectiveness
- Review suggested steps for Compliance Officers to gain access or improve current access to data

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## Questions



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