Evolution of Monitoring Tools in the Physicians Practice to Identify Risk
Valerie T. Cloud, MBA/HCA, CHC, CHPC

Disclaimer

- The information presented is for the purpose of discussion and information only. The opinions expressed in this presentation and on the following slides are solely those of the presenter and does not necessarily reflect the policy, procedure of Atrium Health or its affiliates.
- The presentation shared is from presenters experience and relationships across the various organizations.
Objectives

- Tools that monitor risks in the physician practice
- Development of computer-based training and education on data analytics
- Share lessons learned on our improved experience

Evolution

Defined as the gradual development of something, especially from a simple to a more complex form.
Where are you in the evolution process?

- How many are performing risk assessment specific to your physician practices?
- How do you determine the vulnerabilities for your organization?
- How can we use information and tools today to assess future potential risk in our organization?
In the beginning

Middle Stage
More sophistication

Compliance is Everyone’s Job

Whose Job Is It Anyway?
Potential Risk Areas
What are you measuring?

<table>
<thead>
<tr>
<th>Revenue Cycle</th>
<th>Coding and Billing</th>
<th>Laboratory</th>
<th>Physician Relationships</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medication Sample</td>
<td>Meaningful Use Attestation</td>
<td>Quality</td>
<td>Privacy and Security</td>
</tr>
<tr>
<td>Radiation Safety</td>
<td>Teammate Safety</td>
<td>Real Estate</td>
<td>Licensure and Certifications</td>
</tr>
<tr>
<td>Patient Safety</td>
<td>Documentation Excellence</td>
<td>Physician Relationships</td>
<td>Conflict of Interest</td>
</tr>
</tbody>
</table>

Compliance Cooperative

- Formerly known as the “Matrix”
- Name change as we are evolving our program
- The Compliance Cooperative symbolizes the mutual assistance of our teammates working towards a common goal, who share the benefits of an effective compliance program
- Reflective of the relationship and the body of work being performed
- Work with key stakeholders to identify list of compliance high-risk areas.
- Create a plan that evaluates whether ongoing monitoring and auditing activities are addressing your highest risk areas identified.
- Monitoring plans should detail how identified compliance risks are being tested, reviewed and modified as appropriate.

- Determine how risk are calculating the potential damage an identified risk can cause, if not properly mitigated. This should include direct and indirect financial consequences, as well as likelihood of a risk event.
- Know the current enforcement priorities (e.g., improper physician arrangements)
- Repeat your process to ensure operational and compliance leaders are consistently surveying the environment to assess probability of risk exposure, and impact or damage that may result from risk.

Our cycle
Sample of conversation template

Questions and Logic
Welcome to CompliMET Reports

CompliMET Reports provides a centralized location for you to access Monitoring & Evaluation Tool visualizations and reports.

This report includes three (3) tabs that can be filtered to your specific needs. The content of each is explained below:

**Introductions & Filters:**
Provides four (4) different filtering options that will apply to all tabs when selected.
- Selection of a Parent Entity will show data for all associated entities (this is the suggested starting point)
- Selecting one or more Entity will only show data for the selected entity(ies).
- Selecting one or more Risk Area Topic will show data across all entities for the selected Risk Topic(s).
- Selecting one or more Period will show data for the selected Period(s).

**Summary:**
Provides high-level information, categorized by entity, as a quick snapshot of questionnaire completion progress including correction (if required).

**Risk Area Topic Detail:**
Provides detailed information at the Risk Topic level, categorized by entity and Compliance Liaison.

**Question-level Detail:**

---

**Corporate Compliance**

**Questionnaire Status by Entity**
- Status: Completed, Correction Completed, Response Pending, Incomplete, Pending Correction

**Total Questionnaire Count:** 13296
- Completed: 7823
- Response Pending: 3983
- Pending Correction: 6

**Total Entity Count:** 131
Now What?

- Reviewing your data
- Did you identify deficiencies or gaps in processes?
- Who is responsible for preparing and providing a Corrective Action Plan (CAP)?
- Did you identify an isolated or systemic issue?
- Implementation of CAP?
- Validation testing to ensure your CAP is effective?
- Educate and communicate findings

Key takeaways

- Failing to adopt compliance as a process rather than a static form can present the organization with more risk.
- Risks identified by the monitoring process need to be reinforced with modifications to your compliance program.
- Drive changes with monitoring and evaluation analytics
- Determine whether ongoing monitoring and auditing activities has addressed the adequacy of internal controls.
- Ensure corrective action plans has been implemented for all deficiencies found within the risk area and the corrective actions are working as intended.
- Include results of monitoring and auditing as regular agenda items for operational leaders, key stakeholders and compliance committees.
Contact Information

Valerie Cloud
Assistant Vice President, Corporate Compliance
Atrium Health
Valerie.Cloud@atriumhealth.org
704.512.5946