



Kansas City



Driving Compliance: How to Manage Compliant Activities Without Authority

2020 HCCA Managed Care Conference



Agenda

How to Communicate & Motivate

Angela Muncy, CHC, Director & Medicare Advantage Compliance Officer at BCBSKC

How to Prioritize & When to Escalate

Michelle Rigby, CFE, CHC, Director, Client Services, Health Plan Services Consulting at BluePeak

Recap/Questions

Effective Ways to Communicate and Motivate Business Owners

Survival Tips, Tools, and Best Practices

Building a Culture of Compliance

- Everyone is responsible for compliance!
- Assign compliance partners. Get to know how business departments operate and put yourself in their shoes.
- Make a connection. – How are you?
- Compliance Champions – You cannot do it alone.
- Open Door Policy
- Keep an open mind.

Communicating Effectively

- Communicate early and often.
- Get to the point!
 - When sending an email, cut out the noise.
 - Clearly articulate if action is require.
 - Provide examples if applicable.
- Meetings
 - Draft Agenda/Meeting Minutes
 - Cleary document action items and agree to and document turnaround times.
- Be a good listener.
- Ask questions and do your homework.
- What's at stake?
- What's in it for me?

Cadence of Accountability

Regulatory Review Committee

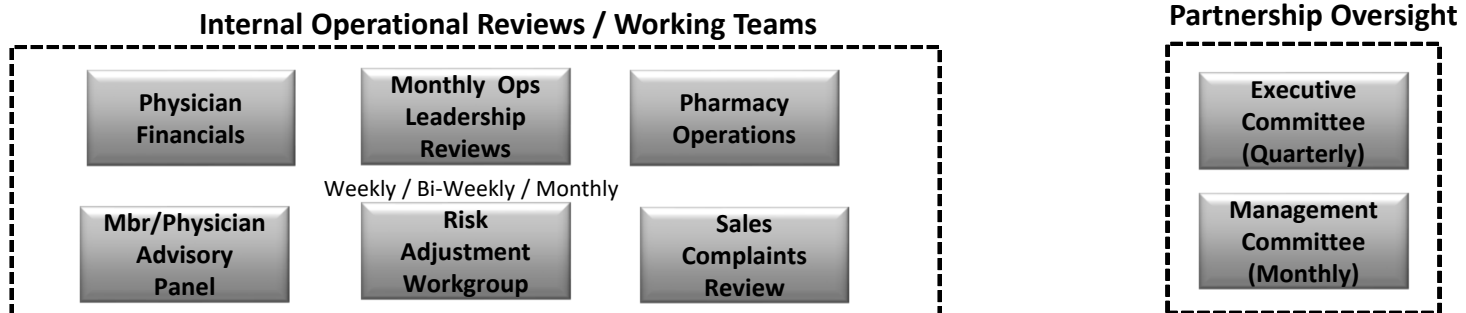
- Review recent guidance and interpretation.
- Discuss risk, impact, and possible solutions.
- Collaborative meeting.
- Safe space.



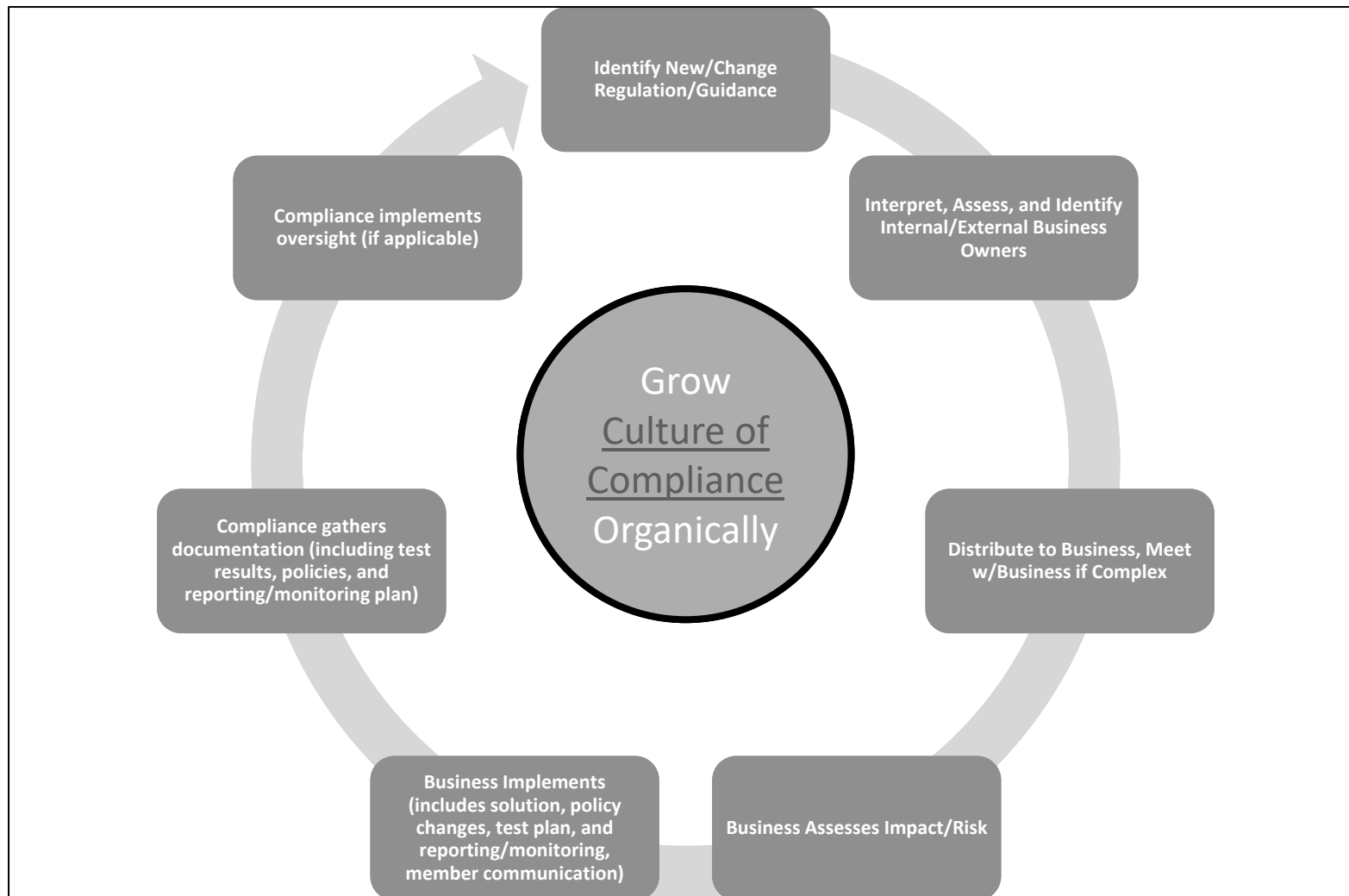
Sample Governance Structure



Day to Day Oversight and Monitoring



Guidance Life Cycle



Prioritizing Issues and Workload Balancing

Best Practices to Drive Compliance
without Overwhelming Business Partners

How to Prioritize Work

- Be clear on the request to include:
 - Why- what is the risk to the organization if task is not completed?
 - Member impact
 - Regulatory impact
 - Financial impact
 - Reputational impact
 - Required Action
 - Timeframes to build, fix and monitor
 - Staffing
 - Make sure this is communicated to the staff doing the work so they understand why and time commitments.
- Open Communication with Management
 - Do timeframes need to be tweaked?
 - Short term vs. Long term
 - Do additional staff need to be hired (temps, interns, repurpose current staff, consultants)?

Overwhelmed?

- Can Compliance or another department assist?
- Think outside the box.
- Praise hard work and milestones being met.
- Celebrate the small wins.
- Build a team and let staff see that everyone is working together to meet the goals-roll up your sleeves.
- Communicate with Senior Leaders on progress and get them involved to help alleviate roadblocks.

When and How to Escalate

(Internally/Externally)

Getting Back on Track

When is the right time to escalate?

- When to Escalate
 - Member Impact
 - Cannot receive services or prescriptions timely
 - Had to go through unnecessary steps to get the benefit (delay PA or more stringent PA process)
 - Had to pay more for services than the benefit stated
 - Communication was unclear to a member on what next steps were
- Financial Impact to the Company
 - Civil Money Penalties
 - Loss of Membership
 - Unable to Market
- Risk to the Reputation of the Company
 - Media Coverage
 - Word of mouth

Assessing the Issue

Deep breath - Verify the issue and impact

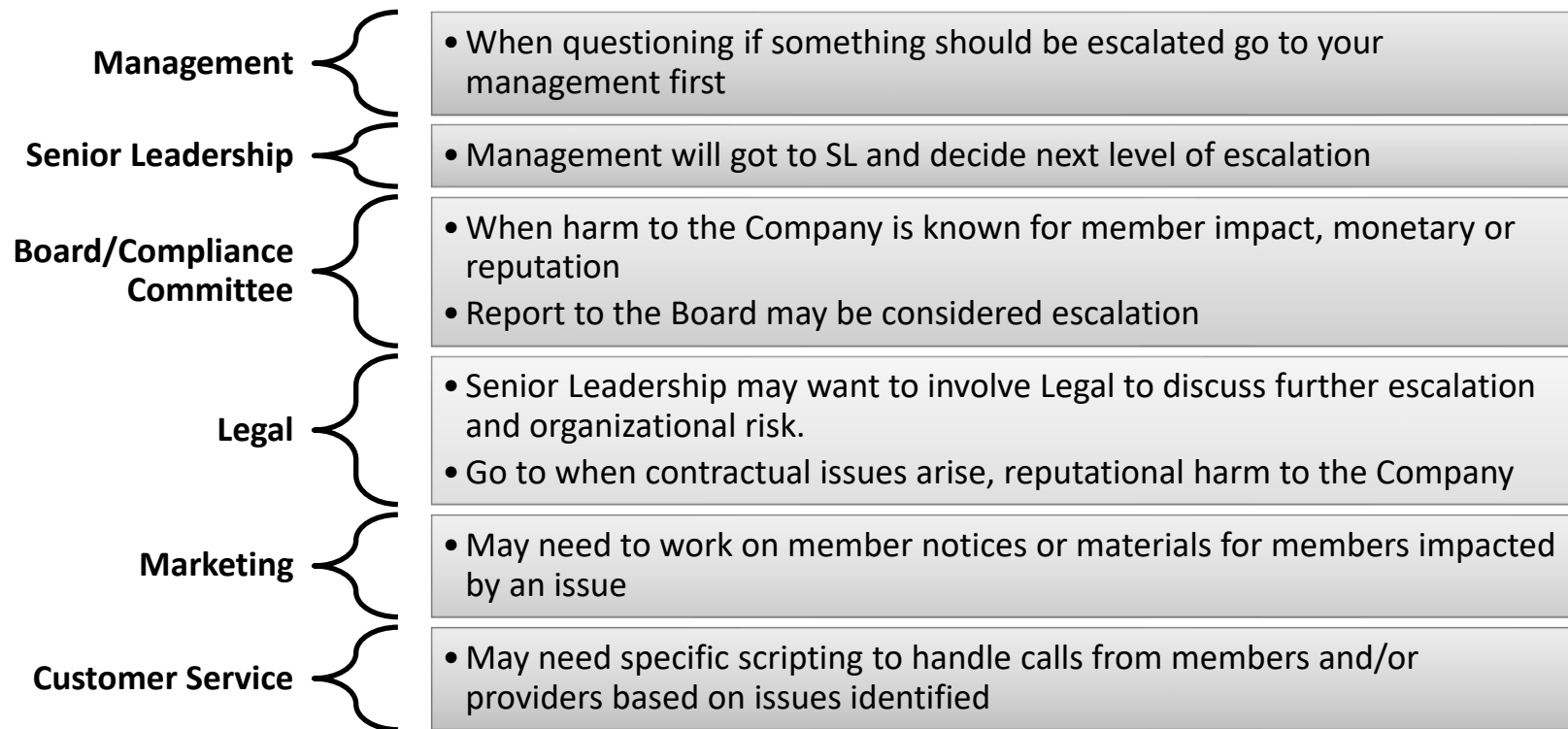
- Is this a trend?
- New staff or new processes?
- Contractual Steps
 - ✓ Escalation Process
 - ✓ Performance Guarantees
- What is the impact?
- What caused the impact?
- Short term vs. Long term fixes and how to prevent it from happening again?

Once you have an understanding of the above you can decide your escalation path.

Be Prepared and Plan Ahead

- Document an escalation path for both internal and external issues that may arise. Keep current.
- Escalation may not always be up the chain of command it may be the need to go across your organization to confirm everyone has the same message.
- Each organization will have a different risk tolerance and process for escalation-document what is best for you.

Who do I escalate to (internal)?



Who do I escalate to (external)?

Vendors

- Seeing a trend in non-compliance
- Performance Guarantees are not being met
- Member impact

CMS or State
Regulators

- Based on your risk tolerance
- Timely
- Member impact
- Clear on impact numbers, root cause and corrective action

Law Enforcement
and/or MEDIC

- Timely
- What you have found as part of your investigation

Summary

Key Points for the Day

Key Points

- Build Relationships
- Communicate Early and Often
- Be Concise in Communication
- Be Open Minded
- Create, Maintain/Evolve, and Follow Repeatable Processes

Remember to breath!



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Questions?





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Thank You

Contact Information:

Angela Muncy
angela.muncy@bluekc.com

Michelle Rigby
mrigby@bluepeak.com

