CIA Reporting Period 2

- July 1, 2017 – June 30, 2018
- CIA Compliance Obligations
  - Outlined in Activities Summary and Completion Tracking Document (see handout)
  - Outline of materials reviewed during Board and/or Health Affairs Committee meetings (see handout)
  - Most items will be completed on or before June 30, 2018
  - Claims Review process is designed to start after the close of the Reporting Period; will end prior to submission of Annual Report
• Executive Compliance Committee (ECC) – Overview of Activities FY18

  – General
  • 10 meetings (*monthly except December and March*)
  • Assessed sub-committee structure
  • Reviewed Chief Compliance Officer position

  – Topic Reports included
  • Corporate Integrity Agreement Updates
  • Compliance Reports
  • Risk Assessment and Work Plans
• Ethics and Compliance Hotline
  – FY17 Year End: 57 cases, 13 referred Title VII/IX
  – FY18 Year to Date: 54 cases, 13 referred to Title VII/IX
• Bias Hotline
  – CY 2017 Year End: 16
  – CY 2018 to date: 5
• Transition to single hotline
  – Project underway to update hotline reporting system and integrate both the Ethics and Compliance Hotline and Bias Hotline to eliminate confusion and provide a single portal for individuals to report and for the organization to manage cases
Training and Education
- CIA-mandated training transitioned to internal learning management software platform, Saba
- As of May 31, 98.3% of current employees completed training modules
- Implemented new live training session to educate leaders (managers and above) on the Code of Conduct

Management Certifications
- Annually, certifications of compliance must be made by management level personnel, as identified in the CIA
- Process will be completed by June 30, 2018
Exclusion Screening

- In April 2018, engaged with a new screening vendor; working on an updated review of all employees and vendors (12,000+ records)
- Anticipate completion in late June
- No identified issues to date

Risk Assessment and Compliance Plan for FY19

- Completed risk assessment in collaboration with UM System Internal Audit Services
- Interviewed stakeholders from hospital and academic units (15 meetings)
• Monitoring and auditing projects scheduled for FY18 will be completed on time. This included:
  – 14 audits covering coding accuracy
  – 5 audits focused on documentation sufficiency
  – 2 reviews of the 340B Drug Pricing Program
  – 14 projects covering various topics, including:
    • Diagnostic Cardiac Catheterizations, Denials Identification and Processing, Medicare Outpatient Observation Notice (MOON) Processes, Two-Midnight Rule Compliance, Advance Practice Professionals Oversight Obligations, Transcatheter Aortic Valve Replacement (TAVR) Program Compliance, and Primary Care Exception Clinics.
CIA Resolution Language

• “The Health Affairs Committee of the Board of Curators of the University of Missouri has made a reasonable inquiry into the operations of the Compliance Program of MU Health (sometimes referred to as University of Missouri Health System or UMHS) including the performance of the Chief Compliance Officer and the Compliance Committee. Based on its inquiry and review, the Health Affairs Committee has concluded that, to the best of its knowledge, UMHS has implemented an effective Compliance Program to meet Federal health care program requirements and the obligations of the Corporate Integrity Agreement.”

• Request for adoption will be made at an upcoming Health Affairs Committee meeting