Health Affairs Committee
Compliance Update
September 10, 2018
CORPORATE INTEGRITY AGREEMENT UPDATE

Reporting Period 2 Complete

• Annual Report and Claims Review filed with the OIG Monitor on Tuesday, August 28, 2018
  – Receipt confirmed on 8/29/18
  – Feedback pending
CIA Reporting Period 3

• July 1, 2018 – June 30, 2019

• CIA Compliance Obligations
  – Current activities include:
    • Reviewing annual report for areas to improve in RP3
    • Reviewing the training plan
    • Reviewing policies
  – Claims Review facility list and selection will occur in Spring 2019
• OIG Compliance Resource Portal
  – Specific section to support healthcare boards
    • Papers, checklists and videos are included
Elements of the MU Health Compliance Program

Organized in accordance with the seven elements outlined by the DHHS OIG for effective compliance programs

1. Designate a compliance officer and compliance committees
2. Develop written compliance plans, policies, and standards of conduct
3. Monitor and audit compliance risk areas
4. Develop open lines of communication
5. Implement education and training
6. Enforce disciplinary standards
7. Respond to detected deficiencies
• Policies and Procedures
  – Utilize common platform, Navex, to develop and distribute across MU Health
  – Annually review all compliance policies for updates

• Training and Education
  – CIA-mandated training transitioned to internal learning management software platform, Saba
  – Implemented live training session to educate leaders on the Code of Conduct
  – Looking to expand training through other media (e.g. newsletters, website, in-service)
Office of Corporate Compliance Staffing Updates

- Tina Adams-Salter, System Privacy Officer
  - Provides oversight and direction of the MU Health privacy program; HIPAA rules compliance and enforcement; Privacy education and training; Assess privacy risks and coordinate organization-wide protections for our patients' protected health information

- Katie Tegerdine, Director of Compliance
  - Provides oversight and direction of MU Health monitoring, auditing, and review programs; Curation of compliance policies and procedures; Develop and coordinate distribution of compliance education; support Risk Assessment process and Work Plan development