

Reported to the Board of Trustees
January 16, 2020

BOARD MEETING
JANUARY 16, 2020

Report on Compliance for the University of Illinois Hospital and Health Science System (UI Health)

Evaluating Effectiveness

Our primary initiative remains driving the elements of compliance into day-to-day decision making across the organization. With the implementation of the UIC Campus Policy on Policies, there is an effort to implement standardization and centralization of vice chancellor level policies across the organization. To develop policy and procedures that reflect the needs established by new regulations, the University of Illinois Hospital and Clinics (UI Hospital) has developed a self-assessment tool to facilitate incorporation of metrics into routine procedures and enhance the management accountabilities that accompany such procedures.

One metric used to evaluate compliance program effectiveness is the use of our compliance hotline. Now in its 17th year, reports have increased nearly 25% this calendar year most likely due to establishing an online reporting system in addition to the toll-free number and more targeted training on how and what to report.

Integrated Information Infrastructure (3i) Project

Vast ongoing efforts are underway to prepare for the 3i Project implementation. To standardize compliant clinical workflows, significant education and support mechanisms are being established to prepare providers for the charge entry process and ensure accuracy of billing, decrease denials and reduce filing deadlines. In the meantime, the College of Medicine continues to audit providers for accuracy and evaluation of ongoing effort effectiveness.

To optimize the 3i Project analytical research capabilities, the UI Hospital is working in close collaboration with the Office of the Vice Chancellor for Research to establish a new office to provide support, resources and education to manage the revenue cycle of patients that are considering or already enrolled in research studies. It will leverage the benefits of an integrated system with powerful analytic capabilities to improve access to clinical research data, human subject data, and monitor hospital and professional revenues. It will also develop new metrics for improved planning of institutional resources and mitigate risks of noncompliance with applicable regulations, including third party payor denials of payments associated with clinical research.

Selected Program Progress

There are a number of general issues that continue to receive attention, leading to improvement within the programs:

1. Compliance education modules were refined and focused, reflecting Medicare's initiative to reduce administrative burden placed on providers.
2. Employee sanction checks against state and federal exclusion lists are being conducted by an outside vendor for all UI Health employees at hire and on a monthly basis. Additionally, the UI Hospital has implemented a sanction and exclusion policy that prohibits retaining an employee that has been excluded from participation in federal or state healthcare programs.
3. Compliance certifications are now required of vendors that provide administrative and/or healthcare services to meet certain Medicare compliance program expectations.

In conclusion, enhancements to our compliance efforts continue to be refined and expanded in concert with preparations for the 3i implementation date of May 9, 2020. There is a great focus and commitment across all levels to leverage our new electronic health record to improve all aspects of patient care, standardize processes and mitigate risks of noncompliance.

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