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

**Compliance Structure**
The UI Health Compliance Operations Committee continues to meet monthly. The membership includes directors of key hospital processes as well as representatives from each of the health science colleges and the regional campuses. Committee agendas focus on reviews of current issues, current investigations, and further development of the compliance effort and organization.

In an effort to adapt to the increasingly complicated healthcare regulatory environment, the Office of the Chief Compliance Office is currently being reorganized. There will be a search for a Chief Compliance Officer to oversee and manage the UI Health Compliance Program. In the meantime, critical duties and functions are being conducted by interim and existing staff.

**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 underway 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 Hospital has developed a self-assessment tool to facilitate incorporation of metrics into routine procedures and to 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 16th year, reports have steadily increased each calendar year. An analysis of our report volume over the last year places us at par with medians from organizations within our vendor's database. Moreover, the breakdown of allegations by category are also consistent with industry benchmarks.

**Selected Program Progress**
To ensure accuracy of billing, provide feedback on documentation issues, decrease denials and reduce filing deadlines, professional coders have become critical. Significant progress has been made in centralizing professional billing coders to a single management structure. The College of Medicine continues to audit providers and coders on a yearly basis for correctness. A well-established program exists for reviewing the coding of inpatient technical charge coders.

To meet Medicare guidelines, OIG recommendations, and state requirements, all employees of UI Health are checked monthly against state and federal exclusion lists. Initially conducted by the Hospital's Human Resource Department, reviews are now being conducted by an outside vendor. Additionally, the Medical Center has implemented a sanction and exclusion policy that

prohibits retaining an employee that has been excluded from participation in federal or state healthcare programs.

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

1. In keeping with Medicare's recent decision to reduce the annual education requirements of providers, beginning in 2019, efforts will be made to refine and focus compliance education modules required of providers and staff.

2. The complexity of clinical trials research billing continues to present challenges, and UI Health has devoted increased resources to address this issue.

3. Education onboarding for newly hired staff includes the necessary general regulatory requirements, but programs aimed at job specific education can be insufficient. This is being addressed by focusing on the development of training manuals for key regulatory-based programs that currently lack such processes. This education will promote standardization of such processes and help ensure more effective compliance efforts throughout the health system.

In conclusion, enhancements to our compliance efforts continue to be developed and refined within the organization. There is a greater focus and commitment across all levels and this has created a better understanding of the importance of these programs and the need to continually improve processes to meet emerging standards in a very complex field and dynamic regulatory landscape.


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