



THE UNIVERSITY OF ILLINOIS HOSPITAL & HEALTH SCIENCES SYSTEM

Compliance Organization

November 14, 2013



UNIVERSITY OF ILLINOIS
Hospital & Health Sciences System
Changing medicine. For good.

WHAT IS COMPLIANCE ?

Compliance is a comprehensive program that helps institutions and their employees conduct operations and activities ethically; with the highest level of integrity, and in compliance with legal and regulatory requirements.

- ***Federally Mandated:***

- Introduced in the Federal Sentencing Guidelines

- ***Compliance Programs***

- Fiduciary Responsibility
- Federal Financial Reporting and Internal Control Standards
- Legal and Regulatory requirements and organizational policies



NAVIGATING THE REGULATORY ENVIRONMENT

- >45 Federal Agencies writing law affecting Health Care
- Anti-kickback Statute
 - Inducing or rewarding referrals
- False Claims Act – documentation
- Civil and Monetary Penalties
- Exclusions
 - Vetting employees through OIG data bases
 - Managing Business Associate Requirements



NINE FUNDAMENTAL ELEMENTS

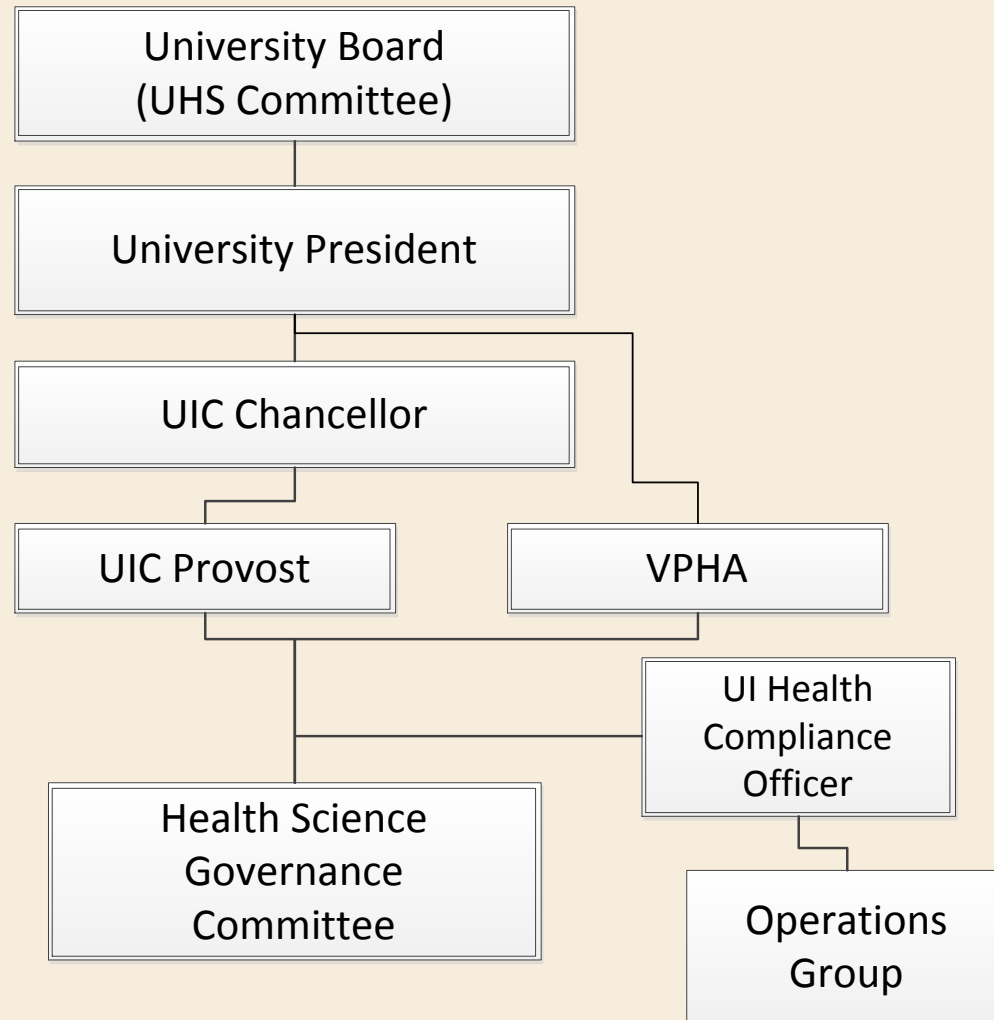
1. Designation of a Compliance Authority
2. Development of Written Policies and Procedures
3. Development of Effective Lines of Communication
4. Conducting Effective Training and Education
5. Enforcement of Standards with Well-Publicized Guidelines
6. Auditing and Monitoring of Business and Care Processes
7. Appropriate Response To Detected Deficiencies
8. Development of Corrective Action Initiatives
9. Conducting regular Risk Assessments of the programs



OPERATING AN EFFECTIVE PROGRAM

- Policies and Procedures must:
 - Reflect federal/state rules and regulations
 - Be up-to-date and user friendly
- Training
 - Educate then Test Knowledge
 - Make training part of the job
- Develop and review benchmarks and goals within departments
- Measure Effectiveness of the Program
 - Audit tools
- Maintain Open Lines of Communication

UI HEALTH COMPLIANCE ORGANIZATION



UI HEALTH GOVERNANCE AND OPERATIONS

- **Governance – HSC**

- VPHA and Provost – Co-Chairs
- Six Health Science Deans
- Vice Chancellor for Research
- Hospital Officers (CEO, CMO, COO)

- **UI Health Operations**

- CCO – Chair
- UI Health Finance
- Six College COs
- Legal Affairs
- University Audits
- Business Office (OBFS)
- Regions
- Mile Square
- Compliance Office Staff
- Ambulatory
- Ad Hoc Units



CURRENT PRIORITIES

- HIPAA
 - Privacy: Designation of University responsibilities for Entity
 - Security: Campus coordination of IT resources
- Management of Business Associate Agreements
- Clinical Research issues – Coverage Analysis
- Revenue Cycle Issues
 - Ambulatory Project – Development of standard business practices across Departments and Units
- Clinician documentation – CDI projects
 - Medical necessity
 - Timeliness of charge entry
- Recovery Audit Contractors

