



# Welcome!

Please locate the **questions portion** of the webinar panel. This is the place for you to ask questions, comment, and engage!

# A **smarter** healthcare makes a **safer** healthcare.

We monitor your healthcare populations to identify compliance and credential issues before they impact patients.



# Our Purpose

To create a **safer** healthcare for  
**everyone.**



# Say **hello** to today's presenters.



**David Servodidio**  
Director of Marketing  
*ProviderTrust*



**Donna Thiel**  
Chief Compliance Officer  
*ProviderTrust*

# Procedures Supporting **Policies** in Your Compliance Program

October 28, 2020





# Today's Agenda:

1. Creating a Strong **Internal Policy Structure**
2. **Case Study:** Ongoing Provider Monitoring
3. **Connecting** Process to the Patient
4. **Connecting** HR and Compliance in 2021

# Creating a Strong Internal Policy Structure



**“It’s better to have no policy than to have a policy that you aren’t following.”**

*Quote by every Compliance and HR Professional*





# Policy Management: The Basics

- Clear **ownership** of policy oversight
  - Compliance, HR, Operations, Legal?
- **Single** Source of Truth
  - Perhaps a Policy for Policies?
- **Defined Method** for Policy Development, Change, Retirement
  - Policy Owner
  - Approval Process
  - Review Process
  - Version Control/Tracking
- **Central location** for publication and housing of policies
  - Intranet
  - SharePoint Site
- Policy **Communication** and **Training**



# Things to Keep in Mind

- Not everything has to be a policy.
- It could be a **best practice or guidance**.
- Make sure employees know how to determine **which policy is current**.
- **Version control** is VERY important for litigation or audit look back periods.
- Annual reviews are important so you can make sure your **current practice matches** the written policy. *Maybe even retire a policy or two.*
- Make sure all your policies have the **same look and feel**
- Determine how to **organize the policies**. By department, by owner, all on one site or multiple links? Who will have historical **policy access**?



# A few questions to check the **P&P Pulse**

1. Is there clear accountability for who **owns** the process?
2. When is the last time you **reviewed the process** for changes/updates?
3. Do you review **every policy every year** or do you have a rotation schedule?
  - a. If you don't have a review process when is the last time you **randomly tested** a few policies to see if you were actually able to follow the procedure?
4. If you asked 10 people outside of your corporate office would they know **where to find** company policies?
5. Ask those same people if they know how to **request a change** to a policy?
6. Have you ever **tested** your policy library to confirm only current policies are available on the site?
7. Is there anything that your **Compliance Committee** could monitor to help you ensure an up to date process?

# Case Study: Ongoing Provider Monitoring

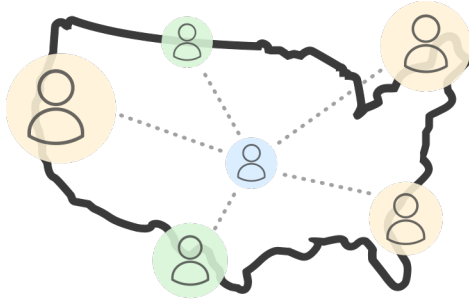


# Asking Questions: Provider Monitoring

1. Who **owns** employee monitoring? Is it shared between HR, Compliance, Others?
2. Do you have a policy for what employee monitoring means?
3. How **often** do you screen your providers, employees, third-parties for exclusions or disciplinary actions?
4. How **accurate** is your provider credential information?
  - a. Do you update information when employees change their names?
  - b. How do you know when a person moves AND how that impacts state licenses? (E.g., Compact Licenses)
5. How are credential concerns **communicated across teams**? How **quickly** does this occur?
6. Who investigates and mitigates these issues?
7. Have you tested the process to feel confident it is being followed?



# Comprehensive Provider Monitoring



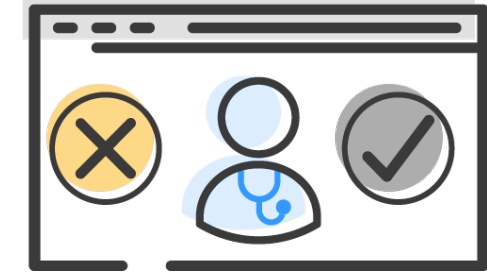
## **Sanctions**

Monitor State Licensing Boards across all 50 States and all healthcare disciplines for any administrative actions.



## **Licenses**

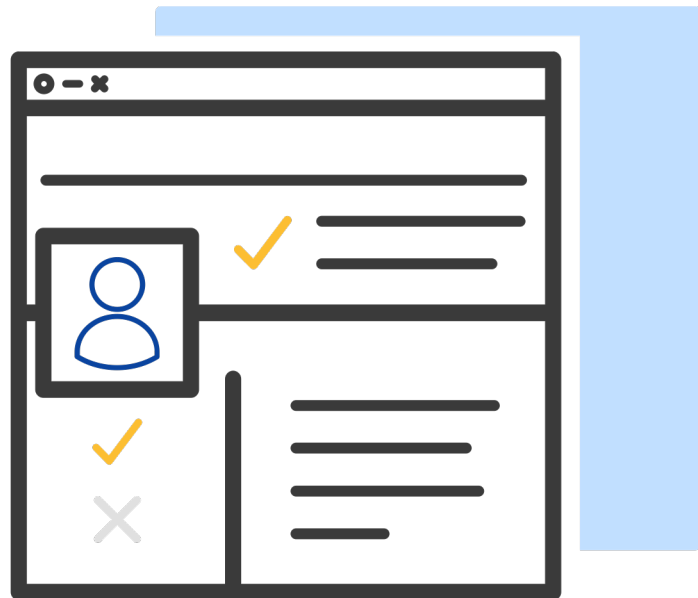
Verify licenses and credentials are active, valid, and up-to-date for every job function within your health system.



## **Exclusions**

Monitor all providers across all Federal (2) and State Medicaid (43) Exclusion Lists.

# Next Steps: License and Provider Monitoring



1. Establish **clear** policies and procedures and team ownership
2. **Reduce** internal fragmentation and variability.
3. **Enable your team** with the tools to support the policies and procedures - Single Source of Truth.
4. **Create accountability** and operational transparency.
5. **Have an agile and flexible policy in short term**
6. Plan for achieving a **comprehensive approach** for increased success

# Connecting Back to the Patient



In the period 2012-2015 - **1,364 excluded providers** treated over 1.2 million Medicare beneficiaries and received more than **\$630 million** in Medicare payments.



Study originally published **May 1, 2019** in the Journal of Health Affairs (Project Hope). [Here's the study.](#)



# In one year:

How many **patients** does an excluded provider treat?

**333**

How many **services** does an excluded provider deliver per patient?

**24**

How much **money** does an excluded provider receive from Medicare?

**\$168,225**

What's the **average payment** per patient to an excluded provider?

**\$500**

# Understanding the patterns of ethnicity.

Medicare patients treated by excluded providers are ***more likely*** to be:

- Black
- Hispanic
- Asian
- Other minority group



# Analyzing the medical diagnosis.

Medicare patients treated by excluded providers are **more likely** to be diagnosed with:

- Depression
- Chronic Kidney Disease
- Diabetes
- Heart Disease



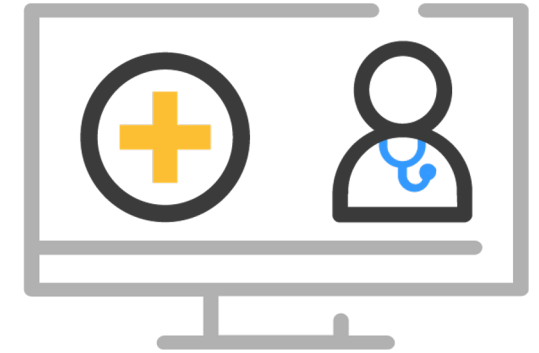
# Connecting HR & Compliance in 2021



# Changing Roles and New Demands

## Have you seen significant changes in your roles and within your organization?

- New responsibilities for COVID-19
- Never ending Regulatory Changes
- New or expanded Telehealth and telemedicine
- Volunteer Assignments (retired, students, emergency responders)



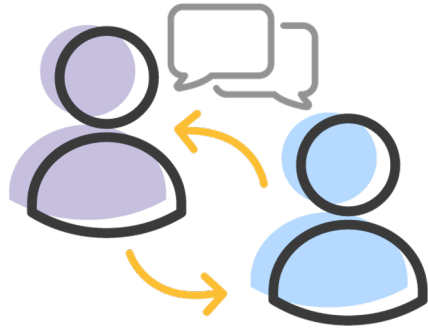
## How are you preparing and meeting new demands?

- Will you ever return to “normal”?
- Policy education and oversight is more difficult than ever
- Making **partnerships more important than ever**
- Understanding your staffing requirements and upholding compliance standards requires both teams

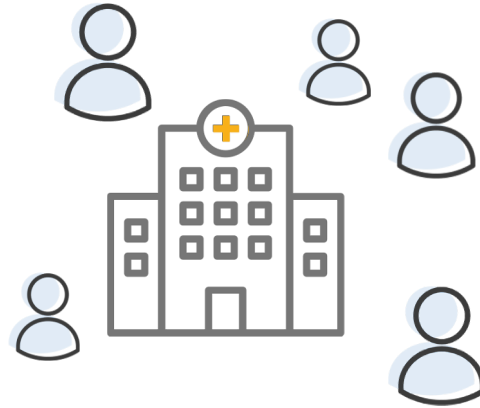




# The 3 C's for Success



**Collaboration**



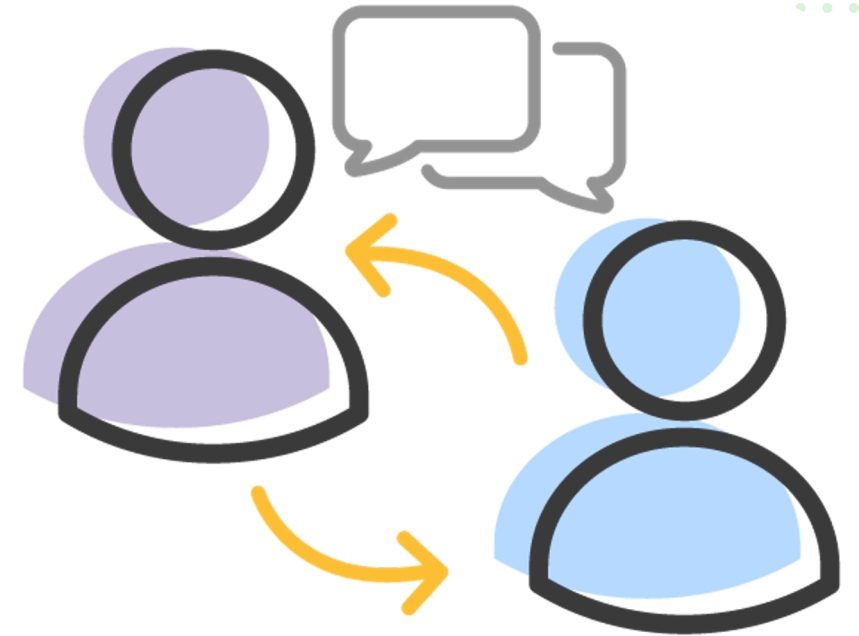
**Coordination**



**Communication**

# Collaboration

1. Establish **clear** communication.
2. **Coordinate communication and new guidelines** between HR and Compliance.
3. **Enable your team** with the tools and/or resources they need to support the organization.
4. **Have an agile and flexible** approach to handle the daily changes you are facing.
5. Begin planning a **comprehensive approach** to manage in a post COVID-19 world.







# Coordination



- **Policies and Procedures**
  - Coordinate who's tracking changes in requirements, interim P&Ps, policy violations
- **Compliance**
  - Many regulations have been modified
  - Do you know all of the policy “changes”?
  - Are they interim changes?
- **Human Resources and Compliance**
  - People are working outside of their normal role
  - Do they know the expectations of their new role and the related policies and procedure?
  - Do they need additional education?



# Communication is Essential



- Create or establish daily routines.
  - What's your cadence?
- Provide simple ways to deliver messages.
  - 5 minute stand-ups
  - Daily emails
  - COVID Team Updates
- Connect each person to their role(s) and expectations.
  - Tell me what matters to me
- Include a positive/encouraging message
  - Remind people there is hope
  - Remind them how important they are
- Tell them where to find help when they need it themselves

## Resources:

[CDC - Hospital Preparedness Checklist](#)

[AHA COVID-19 Communications Resources](#)

[Healthcare Dive: How to Combat Coronavirus Operations Complications](#)

# Get Started



# Getting ready for 2021

1. Define clear accountability for who **owns** the process
2. Determine or confirm the **review process** for changes
3. Make sure you are **tracking policy violations** so you can better understand your high-risk areas
4. **Test** to see if you can still follow the procedure and if there are named resources or links that need to be refreshed
5. Check to see if anyone has **requested a change** to the P&P
6. Ask yourself if you need to update **metrics to report or monitoring** activities for next year
7. **Educate and communicate** any updates to your process so you are confident everyone is clear on policy oversight.



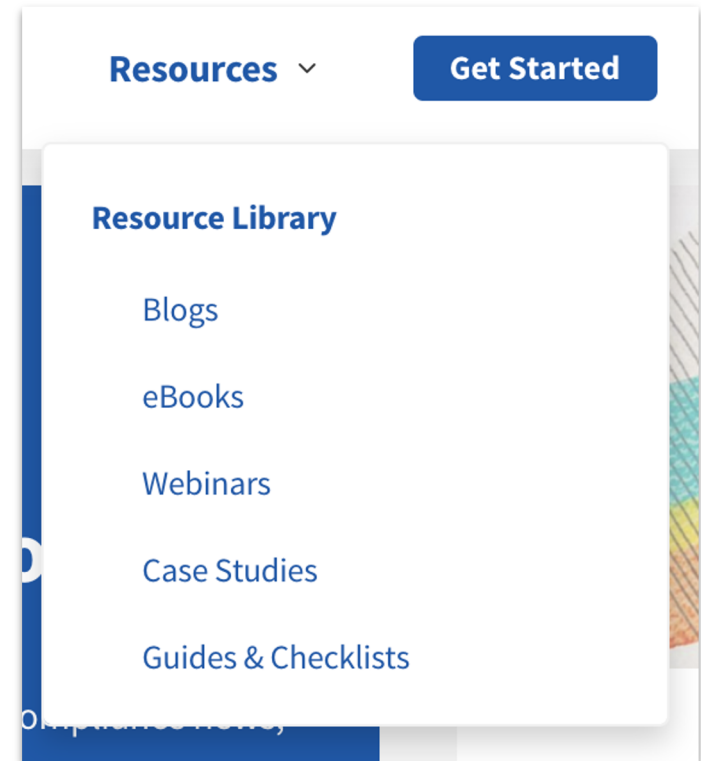
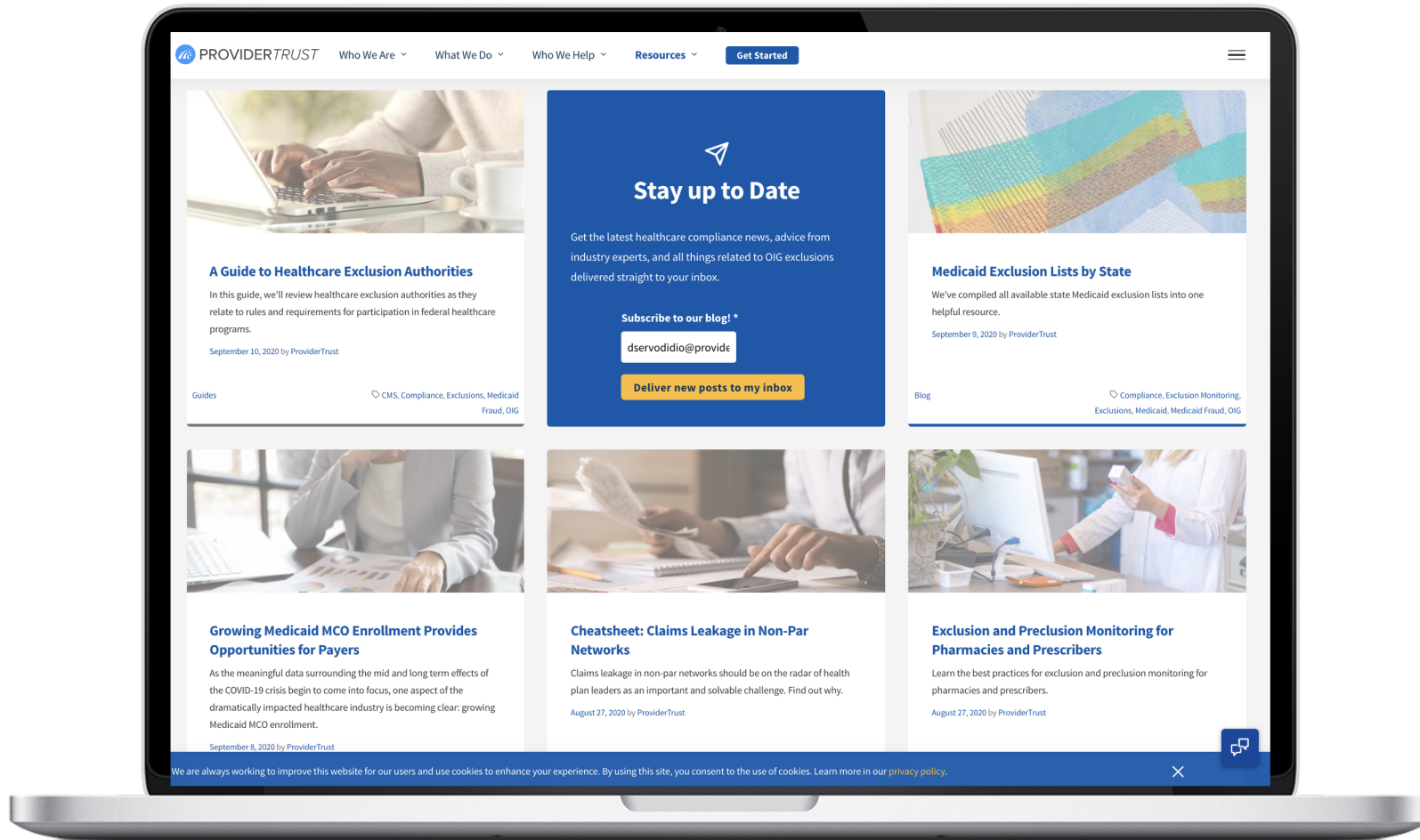
# COVID-19

What gets taken apart must be **put back together**.

**Compliance** and **HR partnering** to understand **regulations**, **safety concerns**, **transitioning operations** and most importantly the **health of your staff** are key to overcoming the never ending challenges and the unknowns of 2021.

**You've got this!**

# Browse Our Library on ProviderTrust.com





# Be Safe and Be Well!



# Let's talk!

**615-938-7878**

Interested in a demo? Click [here!](#)