UW Health Compliance Committee

January 4, 2022, 5:00 - 6:30 PM

WebEx: https://uwhealth.webex.com/uwhealth/j.php?MTID=m8853d656c3660b46a3fe1a3e404eb051

Meeting number: 2623 288 3556 // Password: 010422


**ADVANCE MEETING MATERIALS ARE POSTED FOR REFERENCE. OCCASIONALLY, THE POSTED MATERIALS DO NOT REFLECT CHANGES MADE SHORTLY BEFORE OR DURING COMMITTEE MEETINGS. THE FULL COMMITTEE MINUTES ARE THE OFFICIAL RECORD OF FINAL COMMITTEE ACTION**
Agenda

5:00 PM  I. Call to Order
          Regent Mike Jones

5:00 PM  II. Meeting Minutes - Open Session
          Regent Mike Jones

5:01 PM  III. Third Party Risk Management
          Mr. Troy Lepien
          Presentation - Third Party Risk Management

5:06 PM  IV. Dashboard
          Mr. Troy Lepien
          Presentation - Dashboard

          Attachment - FY22 Integrated UW Health Compliance Dashboard

5:11 PM  V. Closed Session
          (Materials Available to Members Only)
          Motion to enter into closed session pursuant to Wisconsin Statutes section
          19.85(1)(e), for the discussion of confidential strategic matters, which for
          competitive reasons require a closed session: review and approval of
          closed session minutes and executive closed session minutes; and
          pursuant to Wisconsin Statutes section 146.38, for the review and
          evaluation of health care services, including but not limited to discussion of
          corporate compliance overview, reimbursement compliance overview,
          research billing compliance overview, pharmacy compliance overview, and
          privacy compliance overview; and pursuant to Wisconsin Statutes section
          19.85(1)(g) to confer with legal counsel regarding these and other matters.

6:30 PM  VI. Adjourn
          (Meeting may adjourn prior to 6:30 PM)
Third Party Risk Management

Troy Lepien
Open Session – January 4, 2022
Business Integrity

- Article of Interest: Basics of Third-Party Management in Healthcare – RSI Security

**Basics of Third-Party Risk Management in Healthcare | RSI Security**

- Definition of Third Party
- Why it’s Essential in Healthcare
  - PHI
- How to Implement in Healthcare
  - Assessment
  - Resolution
Dashboard
- Provider Conflict of Interest Process
- Cyber-Hygiene Education
- Illinois Medicaid Education
- Organ Procurement Office Hybrid Entity
Attachment

FY22 Integrated UW Health Compliance Dashboard
<table>
<thead>
<tr>
<th>Section and Task</th>
<th>Person</th>
<th>1st Quarter</th>
<th>2nd Quarter</th>
<th>3rd Quarter</th>
<th>4th Quarter</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Preventive Measures:</td>
<td>Troy</td>
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<td>Presented and Approved at Oct (10^{th}) UWHCA Meeting</td>
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<tr>
<td>A. Administrative Activities:</td>
<td>Mary</td>
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<tr>
<td>1. Implement the Code of Conduct training and informal process</td>
<td>Mary</td>
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<td>B. Risk Assessment:</td>
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<tr>
<td>C. Compliance Committee:</td>
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<tr>
<td>1. Jointly implement a new Provider Conflict of Interest Policy for Physicians</td>
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<tr>
<td>2. Review the current Critical Care Billing policy and ensure it is appropriate.</td>
<td>Mary</td>
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<td>D. Comprehensive Program Administration:</td>
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<tr>
<td>1. Participate in the ASHA Roundtable Meeting.</td>
<td>Mary</td>
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<tr>
<td>2. Review current staffing and structure of the Business Integrity Office against AHA Benchmarks.</td>
<td>Mary</td>
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<td>3. Join American Hospital Association's (AHA) Roundtable and AHA Meeting.</td>
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<td>E. Training and Education:</td>
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<tr>
<td>1. Review and update the Annual Compliance Training Standards and procedures.</td>
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<td>2. Conduct an informal process in the Business Integrity Office.</td>
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<td>F. Communication, Education, and Training on Compliance Issues:</td>
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<td>1. Communicate in writing on all aspects of the provider conflict of interest policy and informal process.</td>
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**FY 22 Integrated UW Health Compliance Dashboard**

**A. Preventive Measures:**
- Implement formal and informal policies and standards for employees and providers.

**B. Risk Assessment:**
- Implement a new informal process to monitor and assess compliance.

**C. Comprehensive Program Administration:**
- Participate in the ASHA Roundtable Meeting.

**D. Comprehensive Program Administration:**
- Review current staffing and structure of the Business Integrity Office against AHA Benchmarks.

**E. Training and Education:**
- Review the current Annual Compliance Training Standards and procedures.

**F. Communication, Education, and Training on Compliance Issues:**
- Communicate in writing on all aspects of the provider conflict of interest policy.

**G. Compliance Committee:**
- Participate in the ASHA Roundtable Meeting.

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**Table Note:**
- Percentages indicate the progress made in each quarter.
- Comments section provides additional context or notes.
1. Draft and implement training programs for Conflict of Interest for Providers.

2. Develop an inventory of items or services given to patients and their families without charge by surveying the leadership team, coordinators, and key providers. This activity is tied to the new UW Health 340B Program.

3. Continue individual physician and department in-person education regarding privacy, documentation, coding, and billing practices.

4. Establish a interaction with industry or provider conflict of interest appeals committee. This committee will provide a peer review of potential provider engagements that may be at conflict with UW Health or SMPH interest.

5. Develop a standard process for the investigation and elevation of cybersecurity threats. This will include:
   - Monthly reports of unusual activity or search visits, network intrusion alerts, and password audits.
   - Audits on data sharing met processes.

6. Establish a plan for the investigation and elevation of cybersecurity threats. This will include:
   - Monitoring and reporting unusual activity or search visits, network intrusion alerts, and password audits.

7. Implement a new surveillance software. In addition, the Business Integrity will work with Pharmacy Department to create an evidence-based pharmacy program as part of the new UW Health 34B Program.

8. For-Cause Audits: The Research Billing Compliance Office will be conducting Medicare Coverage Analysis at the request of UW Health. The Office of General Counsel and UW Madison School of Medicine and Public Health. This monitoring will include SAHS.

9. Drug Services: The Business Integrity Office receives complaints about drug diversion. Since these are usually based on the provider's perception of the use of controlled substances, drug diversion prevention and oversight will be conducted by the Business Integrity Office.

10. Change Management: The Business Integrity Office is responsible for change management. The Office is responsible for the implementation of new policies, procedures, and processes as part of the new UW Health 34B Program.

11. System Conflict of Interest Process:
   - Draft and implement training program for Conflict of Interest for Providers.
   - Develop an inventory of items or services given to patients and their families without charge by surveying the leadership team, coordinators, and key providers. This activity is tied to the new UW Health 34B Program.

12. Payment Basis: The Business Integrity Office receives complaints about drug diversion. Since these are usually based on the provider's perception of the use of controlled substances, drug diversion prevention and oversight will be conducted by the Business Integrity Office.