Systems Approach to Compliance Management

Merakey Quality and Compliance Organization
June 20, 2022

Merakey

About Merakey

Leading non-profit provider of innovative community-based, education, and health and human services

Powerful Legacy Spanning 50+YEARS

Nearly **10,000** EMPLOYEES

Providing Care to Almost **50,000** INDIVIDUALS & FAMILIES

Wide Range of Programs

- Addiction Recovery Services
- Adult Behavioral Health Services
- Autism Services
- Intellectual and Developmental Disabilities Services
- Veterans Assistance Services
- Children & Family Services
- Foster Care Services
- Aging Services
- Pharmacy Services

Services Across Multiple States

- California
- Delaware
- Louisiana
- Maryland
- Michigan
- New Jersey
- New York
- Ohio
- Pennsylvania
- Tennessee
- Texas
- Virginia

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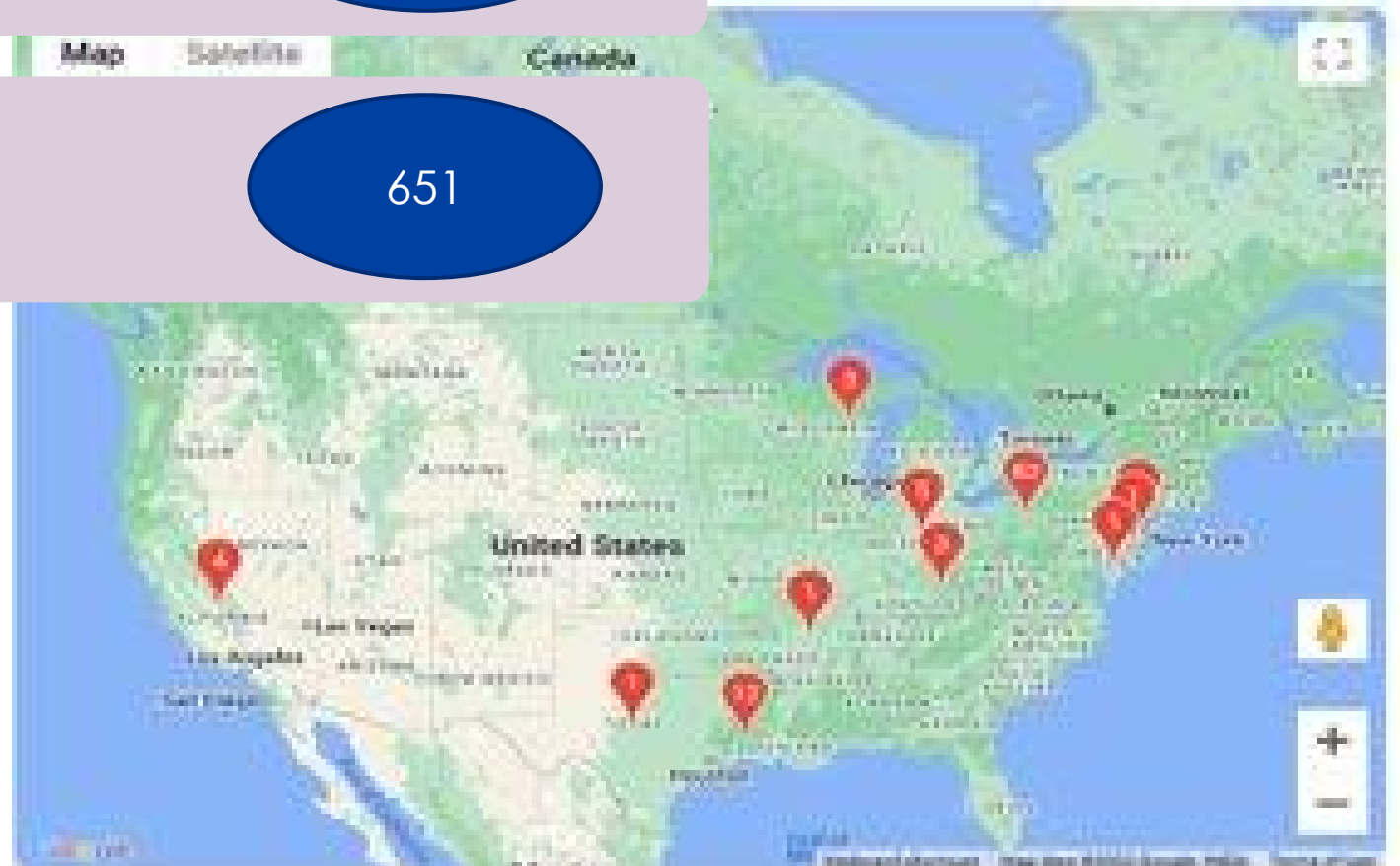
Merakey by the Numbers

Total Number of Programs: **992**

Total Number of Sites: **651**

At a Glance: The Quality and Compliance Organization (QCO)

The QCO-Approximately 45 Staff

The Divisions of the QCO: Compliance and Privacy, Safety and Incident Management and Quality Improvement

Case Volume: Approximately **1500** per quarter with approximately **370** Compliance and approximately **315** Privacy

Cases managed in one central, secure database known as QCOMS (QCO Case Management System)

Capturing Meaningful Data

WHAT DO WE MEASURE?

HOW DO WE MEASURE IT?

WHAT DO WE DO WITH IT?

WHY IS IT IMPORTANT?

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What we measure: Key Performance Indicators

Time to assign to QCO Staff: Target of 2 business days

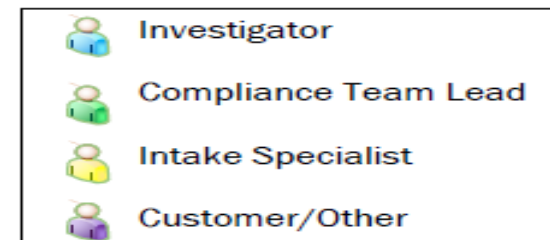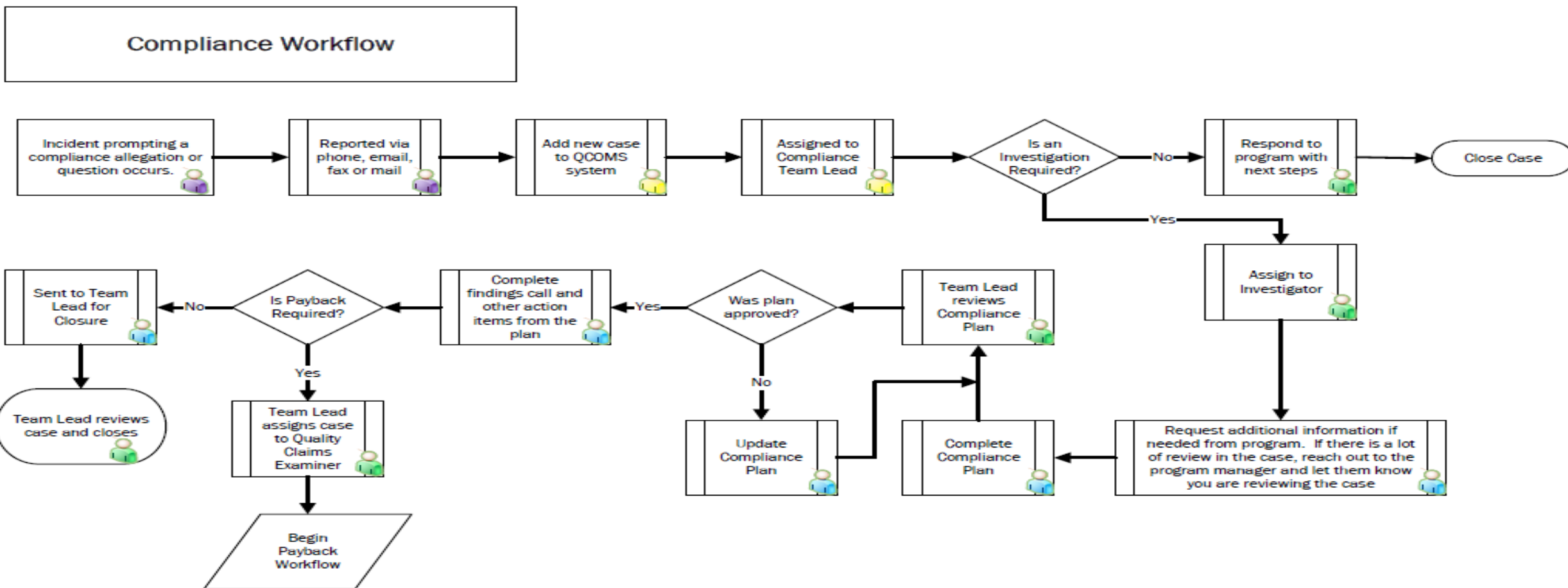From Assignment to when QCO staff make first contact: Target of 2 business days

Completion of Initial Findings: Target of 30 business days

Processing of a Payback: Target of 30 business days from confirmed findings
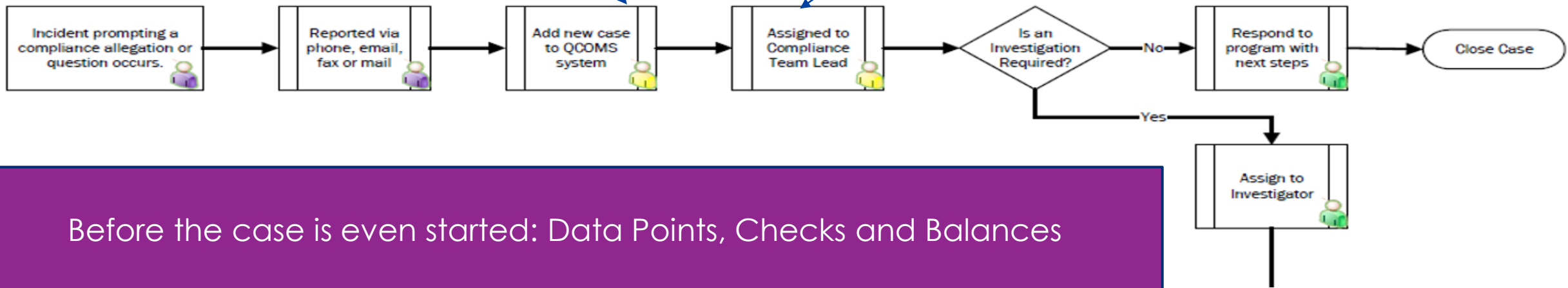
Compliance Case A to Z: Data Points and Safeguards Along the Way

How we measure: The Early Stages-Critical Data Points and Safeguards

Capture of relevant data in our system that is used later for tracking, quality assurance, trending, KPI, etc.

- Select Case Code-What type of case (what is the action)?

- Select Intake Code-What is the issue?

- Date Assigned/Case note

Incident prompting a compliance allegation or question occurs. → **Reported via phone, email, fax or mail** → **Add new case to QCOMS system** → **Assigned to Compliance Team Lead** → **Is an Investigation Required?** —No→ **Respond to program with next steps** → **Close Case**

Yes→ **Assign to Investigator**

Before the case is even started: Data Points, Checks and Balances

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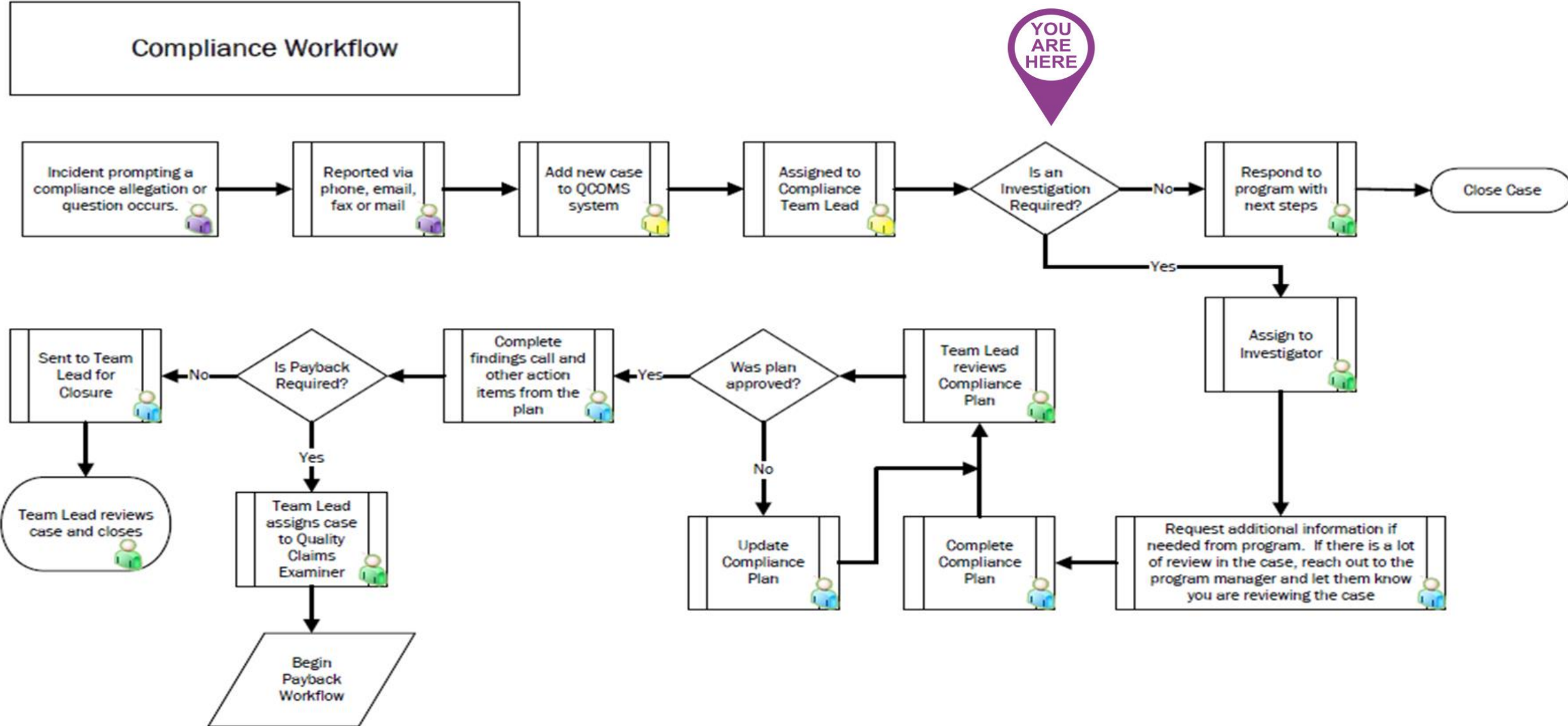
How we measure: Payback is Needed-Data Points and Safeguards

Payback Workflow

Case is assigned to Quality Control Examiner → Review claims spreadsheet and verify the claims. → Self Report and Claims spreadsheet is emailed to the program for review. → Program has 4 business days to respond to the letter.

Meet with the program and make any changes to the Self Report if necessary ← Yes ← Is the payback disputed?

No

Submit a check request to the Executive Director of Quality and Compliance for signature ← Send the check request to Finance ← Write check and send to Accounts Payable ← Accounts Payable prints report, spreadsheet and check to send to the payor

Quality Control Claims Examiner closes cases in QCOMS

Now what?

Useful Data is Key

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What do we do with it: Sample of Weekly KPI Data in Action

Date of 1st Contact
(Target 2 days)

Fiscal Year	All
Outcome Status	(Multiple Items)

		Quarter								Total	
		Quarter4		Quarter3		Quarter2		Quarter1		Total Average of KPI	Total Total Cases
Assignment	Role	Average of KPI	Total Cases	Average of KPI	Total Cases	Average of KPI	Total Cases	Average of KPI	Total Cases		
⊟ Alice	QCO					3.00	1			3.00	1
⊟ Ariel	Investigator							2.00	1	2.00	1
	QCO			1.50	2			2.00	1	1.67	3
⊟ Aurora	Investigator	2.00	2	2.00	4	2.60	5	4.00	2	2.54	13
	Team Lead					2.00	2			2.00	2
⊟ Bambi	Investigator	1.50	2	1.67	3					1.60	5
	Team Lead	1.41	22	1.40	40	2.12	33	2.54	41	1.92	136
⊟ Belle	Investigator	2.00	1	1.50	8	1.75	4	2.00	5	1.72	18
⊟ Buzz	Investigator	1.50	6	1.67	6	2.00	5	2.67	6	1.96	23
	QCO	2.00	1	1.00	1			1.00	1	1.33	3
⊞ Charming						2.00	1			2.00	1
⊟ Cinderella	Investigator	1.67	3	0.71	7	1.00	1	2.50	2	1.23	13
⊟ Donald	QCO			1.50	2	4.00	1	3.00	2	2.60	5
⊞ Elsa				2.00	1					2.00	1
⊟ Goofy	Team Lead			2.00	1					2.00	1
⊟ Jasmine	Team Lead					3.00	1			3.00	1
⊟ Mickey	Investigator					2.00	2	1.89	9	1.91	11
⊟ Queen	Investigator			1.50	2	3.00	1	1.00	1	1.75	4
	QCO	2.25	4	1.00	4					1.63	8

What do we do with it: Sample of Weekly KPI Data in Action

Date Assigned - Date Initial Report Submitted
(Target 30 days)

Fiscal Year	All
Case Type	Compliance Investigation Stand
Outcome Status	All

Assigned	Role	Quarter4 Average KPI	Quarter4 Total Cases	Quarter3 Average KPI	Quarter3 Total Cases	Quarter2 Average KPI	Quarter2 Total Cases	Quarter1 Average KPI	Quarter1 Total Cases	Total Average KPI	Total Total Cases
⊞ Ariel		16.875	8							16.875	8
⊟ Aurora	Investigator					46.00	2	32.40	5	36.29	7
⊟ Bambi	Investigator	17	1	16.80	5	17.67	3	18.80	5	17.71	14
⊟ Cinderella	Investigator	36	1	20.67	3	6.00	1	67.00	1	28.50	6
⊟ Daisy	Investigator	🚩 55	2	108.25	4	44.50	2	86.00	2	80.40	10
⊟ Donald	Investigator	26	2	20.38	8	50.00	4	50.67	3	33.35	17
⊟ Rapunzel	Investigator							41.33	3	41.33	3
⊟ Tiana	Investigator	30	3	36.00	1					31.50	4
Grand Total		25.88	17	37.05	21	36.67	12	40.58	19	35.20	69
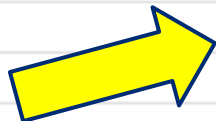
What do we do with it: Weekly Summary Report: Net Gain/Loss

Compliance Case Report - Weekly Summary

| Week	Received Initial Inquiry	Closed Initial Inquiry	Net Gain/Loss	Received Compliance	Closed Compliance	Net Gain/Loss	Received Compliance Audit	Closed Compliance Audit	Net Gain/Loss	Total Received	Total Closed	Total Gain/Loss
5/23/22-5/27/22	1	3	-2	7	2	5	0	0	0	8	5	3
5/16/22-5/20/22	0	2	-2	3	0	3	0	0	0	3	2	1
5/9/22-5/13/22	1	3	-2	0	2	-2	0	0	0	1	5	-4
5/2/22-5/6/22	4	0	4	2	0	2	1	0	1	7	0	7
4/25/22-4/29/22	0	2	-2	1	3	-2	0	0	0	1	5	-4
4/18/22-4/22/22	0	0	0	4	1	3	0	0	0	4	1	3
4/11/22-4/15/22	1	2	-1	7	7	0	0	0	0	8	9	-1
4/4/22-4/8/22	1	0	1	3	2	1	1	0	1	5	2	3
3/28/22-4/1/22	1	6	-5	6	0	6	0	0	0	7	6	1

What do we do with it: Weekly Manager Case Report

Perhaps our most used report. Updated weekly for all managers

Let's see how they use it…sit back and enjoy the brief show

Why is it important: The use of our data outside of the QCO
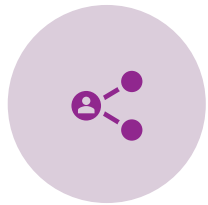
Transparency and Accountability to Stakeholders
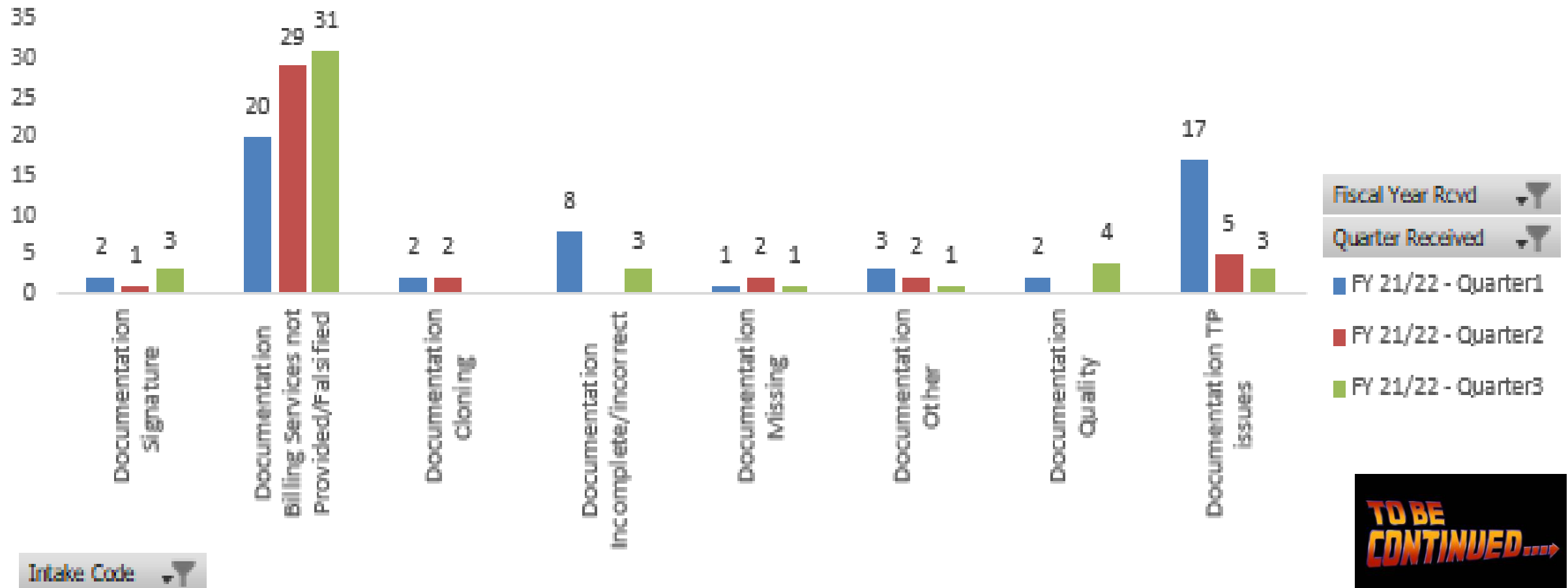
Resource Allocation and Planning

Risk Mitigation and Quality Improvement

# Compliance Cases per type...to be continued on next slide

Each can be broken down to show more detail

Documentation

Chart data — Documentation categories by quarter (PY 21/22):

Intake Code	PY 21/22 - Quarter1	PY 21/22 - Quarter2	PY 21/22 - Quarter3
Documentation Signature	2	1	3
Documentation Billing Services not Provided/Falsified	20	29	31
Documentation Cloning	2	2	
Documentation Incomplete/Incorrect	8		3
Documentation Missing	1	2	1
Documentation Other	3	2	1
Documentation Quality	2		4
Documentation TP Issues	17	5	3

Fiscal Year Rcvd

Quarter Received

Intake Code

TO BE CONTINUED....

Why is it important: Comprehensive Compliance Data by issue for Quarter

Each of the data points below can be broken down for more specific details
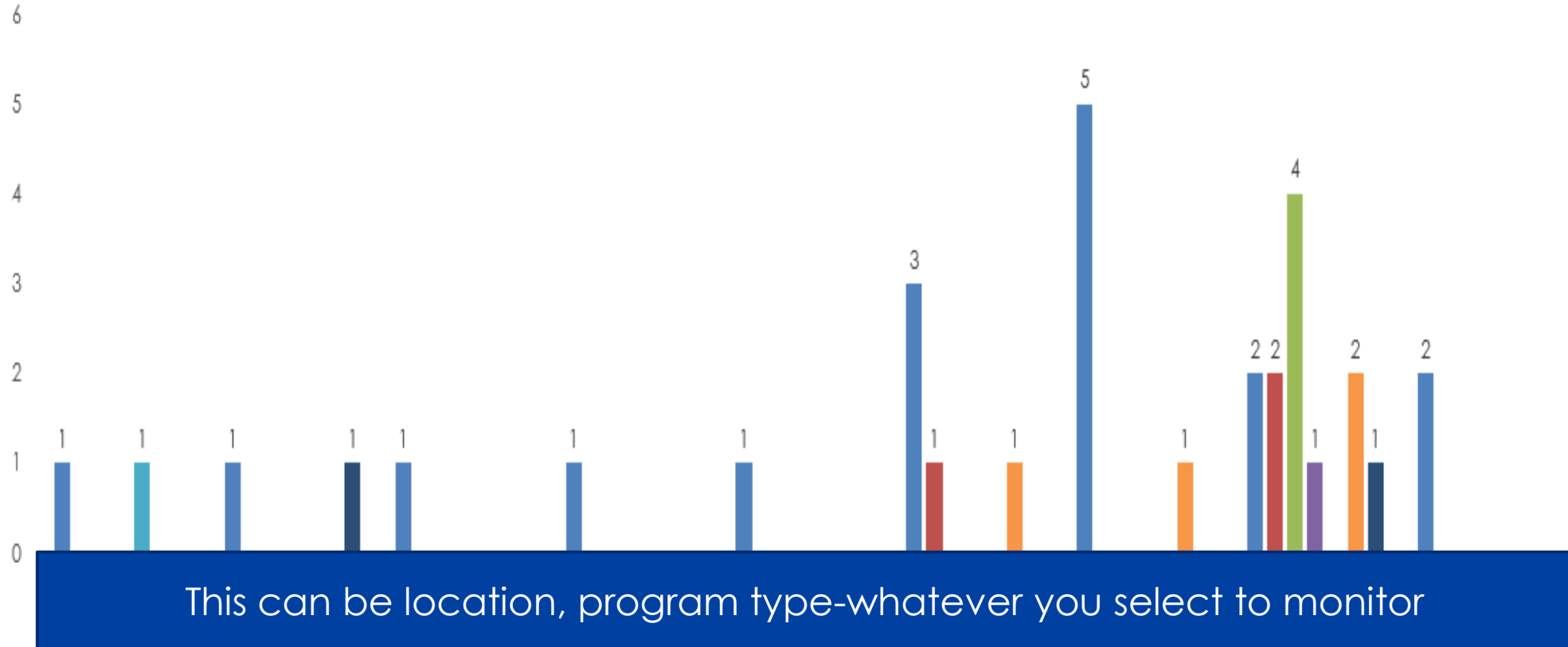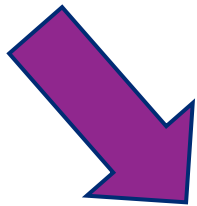
This can be location, program type-whatever you select to monitor

■ Documentation Billing Services not Provided/Falsified	1	1	1	1	1	3	5	2	2
■ Documentation Cloning						1		2	
■ Documentation Incomplete/incorrect								4	
■ Documentation Missing								1	
■ Documentation Quality		1							
■ Documentation TP issues						1	1	2	
■ Job Credentialing			1					1	

Sample of Payback Data Comparison by Quarter
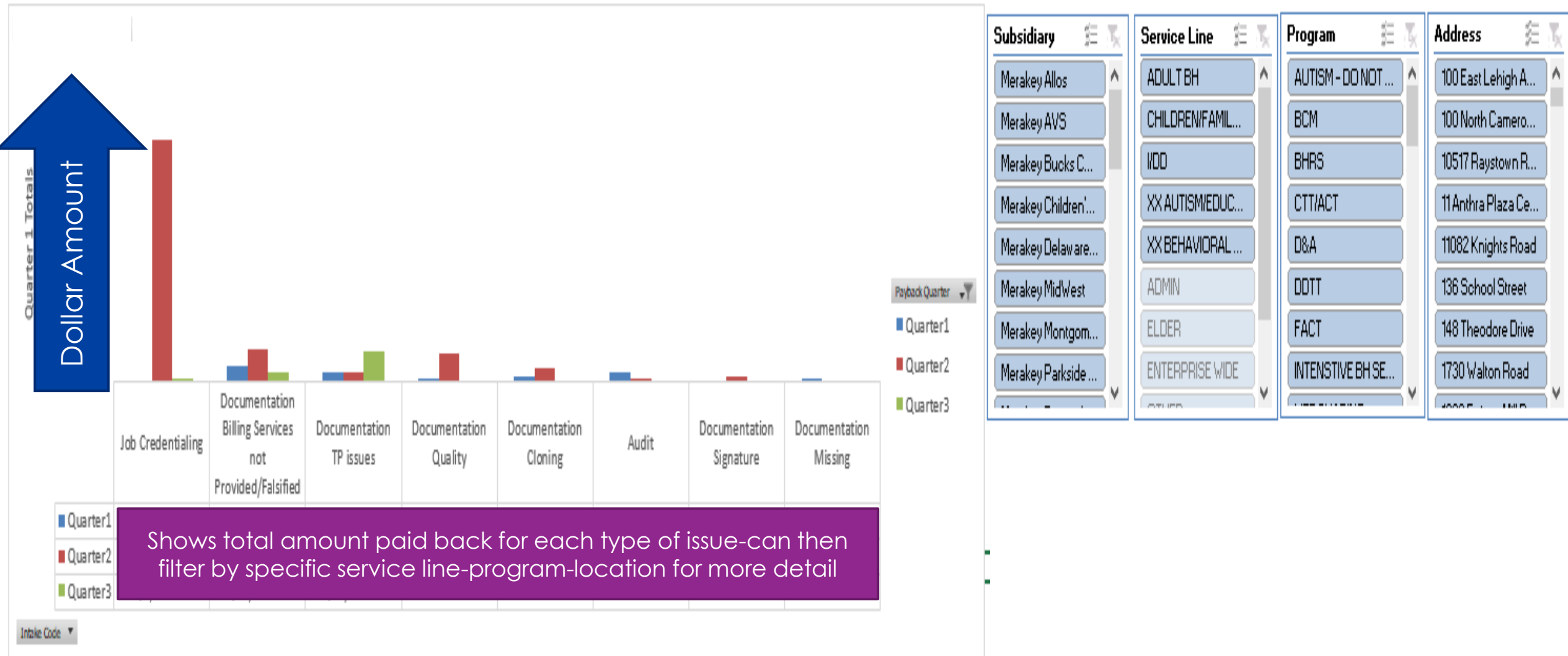
Annual Compliance and Audit Plans

Enterprise Risk Management

Performance and Quality Improvement

Final Thoughts and Questions

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