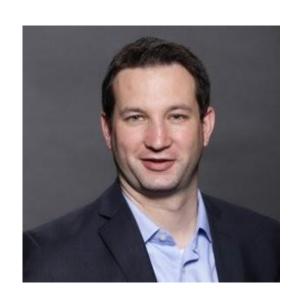
Engagement with Executive Management

How to Arm Compliance with Specific Data That Informs
Decision Making

Speakers



Dr. Daniel Fabbri, Founder & CEO, Maize Analytics, Inc.

 Assistant Professor of Biomedical informatics and Computer Sciences, Vanderbilt University

Speakers



Margaret Hambleton, MBA, CHC, CHPC President of Hambleton Compliance

- Current member of the Board of Directors of the Society of Corporate Compliance and the Health Care Compliance Association
- Over 20 years in healthcare compliance

The Big Question

How do I get business executives to care about compliance as much as I do?!

The Answer

You can't

The RIGHT Question

How can we frame compliance metrics in a way that supports the things that make the business executives excited?

Typical Compliance Metrics

- Number of hotline calls received
- Response time to hotline call
- Source of hotline awareness
- Number / type of privacy violations

- Time to close an investigation
- Number of trainings delivered
- Training completion rates
- Policy disseminations

Typical Compliance Metrics

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Useful Compliance Metrics

Metrics that are framed to help executives manage critical strategic and operational priorities.

Useful Compliance Metrics

Priorities:

- Quality
- Revenue
- Costs
- Growth
- Patient and Employee Satisfaction
- Reputational, financial and operational risk

Metrics to use

Process Metrics:

Show program effectiveness

Outcome Metrics:

Show results: Audit, monitoring, investigations

Process Metrics

Important, but not exciting

"Why should executives care about this info?"

Process Metrics

Process Measure	Strategic Priority	Rational for Inclusion
Hotline reports received by allegation	 Employee/Physician Satisfaction Operational and Reputational Risk 	 Shows issues and concerns of employees. Recognize emerging risk. Can be used with other employee satisfaction data.
Sustained high severity hotline reports and investigations	 Operational and Reputational Risk 	 Shows actual risk that needs attention. Additional info needed on specific allegations.
Number of timely compliance trainings completed by executives	• Culture	 Reflects perceived commitment to compliance.
Number of confirmed improper accesses to or use of PHI	Patient SatisfactionOperational and Reputational Risk	 Shows potential patient harm. Provide insight on potential reporting obligations. Reflect training effectiveness.

Process Metrics

• Tie metrics in with strategic priorities.

Indicate of trends over time and criticality.

Outcome Metrics

• Tie to risk assessment priorities.

Often easier to align with strategic priorities

Outcome Metrics

Outcome Measure	Strategic Priority	Rational for Inclusion
New physician coding audit results	 Growth Financial, Operational and Reputational Risk 	 Reflects how quickly and effectively new physicians can be integrated into the organization.
Physician contracts and payment audits	 Growth Financial, Operational and Reputational Risk	Helps adjust growth strategy.
Risk based employee access audits	 Patient Satisfaction Culture Financial, Operational and Reputational Risk 	Show's org.'s commitment to compliance.
Focused claim coding audits	 Financial, Operational and Reputational Risk 	 Risk assessment will find areas to focus auditing and monitoring program. Show effectiveness of newly deployed initiatives

Gathering Metrics

Derive from:

- The seven elements of an effective compliance program
- Risk assessment priorities
- Specific risk areas

Data Fatigue is real.

Don't show metrics for every aspect of your program.

Gathering Metrics

Different audiences = Different data

Tailor data and metrics for the audience.

Connect your information with other organization data

• E.g., How do compliance metrics relate to quality?

Conclusion

Align compliance metrics with strategic priorities.

Utilize process measures and outcome measures

Tailor information based on the audience

Questions?