Third Party Internal Control Online Tool Findings

2010 Partnership

Nashville, TN

John Rael

Online Tool Overview

- The Online tool collects data and measures compliance with the Third Party Internal Controls Policy

- Semi-Annual Reporting periods
  - 1st and 2nd Quarter for each FY starts April 1st to May 1st
  - 3rd and 4th Quarter for each FY starts October 1st to November 1st

Changes to Online tool

- New follow up procedures for all Service Units signed by Director of ORAP on January 7th 2010.
  - Red Flagged Items (21 Days to submit **CAP** to Area Director for Approval then forward to ORAP)
  - overall summary of key elements and general follow-up items that are of concern and/or need clarification. (must follow up within 45 days)
- New reports for managers, CEO's, and other Area Office personnel

Online Tool Results

- Red Flag Items – The Red Flagged Items are considered critical, and if not corrected could have an adverse impact on Collection of Third Party Revenue at the identified facility.

    - <u>Item # 1</u>: *Facilities that Have a Backlog of 30 Days or More In Coding*
    - <u>Item # 2</u>: *Facilities that Have a Backlog of 30 Days or More In Billing (Outpatient)*
    - <u>Item # 3</u>: *Facilities that Have a Backlog of 30 Days or More In Billing (inpatient)*
    - <u>Item # 4</u>: *Facilities that Are Not Transmitting Approved Claims within 1 Business Day*
    - <u>Item # 5</u>: *Facilities that Are Not Posting within 72 Hours from the Receipt of Supporting Documentation*
    - <u>Item # 6</u>: *Facilities that Are Not Reviewing and Researching Ageing Accounts within 45 Days*

Item # 1: *Facilities that Have a Backlog of 30 Days or More In Coding*

Aberdeen Area – 3 Facilities Red Flagged

Albuquerque Area – 1 Facility Red Flagged

Bemidji Area – 2 Facilities Red Flagged

Billings Area – 1 Facility Red Flagged

Nashville Area – 0 Facilities Red Flagged

Navajo Area – 0 Facilities Red Flagged

Oklahoma Area – 2 Facilities Red Flagged

Phoenix Area – 1 Facility Red Flagged

Portland Area – 0 Facilities Red Flagged

Tucson Area – 0 Facilities Red Flagged

IHS Total – 10 Facilities Red Flagged

Item # 2: *Facilities that Have a Backlog of 30 Days or More In Billing (Outpatient)*

Aberdeen Area – 3 Facilities Red Flagged

Albuquerque Area – 3 Facilities Red Flagged

Bemidji Area – 1 Facility Red Flagged

Billings Area – 1 Facility Red Flagged

Nashville Area – 0 Facilities Red Flagged

Navajo Area – 0 Facilities Red Flagged

Oklahoma Area – 3 Facilities Red Flagged

Phoenix Area – 3 Facilities Red Flagged

Portland Area – 3 Facilities Red Flagged

Tucson Area – 0 Facilities Red Flagged

IHS Total – 17 Facilities Red Flagged

Item #3: *Facilities that Have a Backlog of 30 Days or More In Billing (inpatient)*

Aberdeen Area – 4 Facilities Red Flagged

Albuquerque Area – 2 Facilities Red Flagged

Bemidji Area – 1 Facility Red Flagged

Billings Area – 2 Facilities Red Flagged

Nashville Area – 0 Facilities Red Flagged

Navajo Area – 0 Facilities Red Flagged

Oklahoma Area – 1 Facility Red Flagged

Phoenix Area – 1 Facility Red Flagged

Portland Area – 1 Facility Red Flagged

Tucson Area – 0 Facilities Red Flagged

IHS Total – 12 Facilities Red Flagged

Item # 4: *Facilities that Are Not Transmitting Approved Claims within 1 Business Day*

Aberdeen Area	–	2 Facilities Red Flagged
Albuquerque Area	–	1 Facility Red Flagged
Bemidji Area	–	0 Facilities Red Flagged
Billings Area	–	2 Facilities Red Flagged
Nashville Area	–	0 Facilities Red Flagged
Navajo Area	–	0 Facilities Red Flagged
Oklahoma Area	–	0 Facilities Red Flagged
Phoenix Area	–	3 Facilities Red Flagged
Portland Area	–	0 Facilities Red Flagged
Tucson Area	–	0 Facilities Red Flagged
IHS Total	–	**8 Facilities Red Flagged**

Item # 5: *Facilities that Are Not Posting within 72 Hours from the Receipt of Supporting Documentation*

Aberdeen Area – 5 Facilities Red Flagged

Albuquerque Area – 4 Facilities Red Flagged

Bemidji Area – 2 Facilities Red Flagged

Billings Area – 2 Facilities Red Flagged

Nashville Area – 0 Facilities Red Flagged

Navajo Area – 2 Facilities Red Flagged

Oklahoma Area – 1 Facility Red Flagged

Phoenix Area – 3 Facilities Red Flagged

Portland Area – 2 Facilities Red Flagged

Tucson Area – 0 Facilities Red Flagged

IHS Total – 21 Facilities Red Flagged

Item # 6: *Facilities that Are Not Reviewing and Researching Aging Accounts within 45 Days*

Aberdeen Area   – 3 Facilities Red Flagged

Albuquerque Area   – 3 Facilities Red Flagged

Bemidji Area   – 1 Facility Red Flagged

Billings Area   – 0 Facilities Red Flagged

Nashville Area   – 0 Facilities Red Flagged

Navajo Area   – 2 Facilities Red Flagged

Oklahoma Area   – 4 Facilities Red Flagged

Phoenix Area   – 1 Facility Red Flagged

Portland Area   – 2 Facilities Red Flagged

Tucson Area   – 1 Facility Red Flagged

IHS Total   – 17 Facilities Red Flagged

Findings (cont.)

- Please provide the Total Number of coders at your facility. And please provide the Average Number of visits at your facility per month that are coded. Based on this, we calculated number of visits coded per coder 1st Data Call
    - Aberdeen   1135
    - Albuquerque   1535
    - Bemidji   2070
    - Billings   **4250**
    - Nashville   360
    - Navajo   1176
    - Oklahoma   1313
    - Portland   2623
    - Phoenix   n/a
    - Tucson   701
    - IHS Average   1685

Findings (cont.)

- Please provide the Total Number of coders at your facility. And please provide the Average Number of visits at your facility per month that are coded. Based on this, we calculated number of visits coded per coder 2nd Data Call
    - Aberdeen   1162
    - Albuquerque   1487
    - Bemidji   1588
    - Billings   **2525**
    - Nashville   339
    - Navajo   1036
    - Oklahoma   1687
    - Portland   2189
    - Phoenix   1432
    - Tucson   1542
    - IHS Average   1498

Findings (cont.)

- Please provide the Total Number of coders at your facility. And please provide the Average Number of visits at your facility per month that are coded. Based on this, we calculated number of visits coded per coder FY2009 1st and 2nd Q data call
  - Aberdeen   1149
  - Albuquerque   1183
  - Bemidji   2852
  - Billings   1878
  - Nashville   600
  - Navajo   888
  - Oklahoma   1391
  - Portland   1534
  - Phoenix   1906
  - Tucson   1543
  - **IHS Average**   **1290**

Findings (cont.)

- Please provide the Total Number of coders at your facility. And please provide the Average Number of visits at your facility per month that are coded. Based on this, we calculated number of visits coded per coder FY2009 3rd and 4th Q data call
  - Aberdeen   1168
  - Albuquerque   1390
  - Bemidji   2281
  - Billings   1689
  - Nashville   700
  - Navajo   898
  - Oklahoma   1306
  - Portland   1904
  - Phoenix   1626
  - Tucson   1619
  - **IHS Average   1315**

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Report Type:	1: All Answers for Active Facilities
Location:	Select IHS Facility
Section(s):	All Sections 1 - Facility Specific Procedures 2 - IT Systems 3 - Patient Registration / Check In 4 - Benefits Coordination
Reporting Period:	FY 2008 - End of 3rd Quarter
Answer:	☐ Yes ☐ No ☐ N/A
Has Explanation:	○ Yes ○ No ● All
	Generate Report

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Location:	1: All Answers for Active Facilities
Section(s):	2: Completion Status Report for Active Facilities
	All Sections
	1 - Facility Specific Procedures
	2 - IT Systems
	3 - Patient Registration / Check In
	4 - Benefits Coordination
Reporting Period:	FY 2008 - End of 3rd Quarter ▾
Answer:	☐ Yes ☐ No ☐ N/A
Has Explanation:	○ Yes ○ No ◉ All
	Generate Report

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Select IHS Facility
ALL IHS AREAS - IHS NATIONAL
ABERDEEN AREA (10,15,17,19)
  Cheyenne River (101001)
  Crow Creek (101430)
  Pine Ridge Hospital (101501)
  Quentin N. Burdick Memorial Health Facility (101901)
  Rapid City GMS (100901)
  Rosebud Hospital (101601)
  Sisseton-Wahpeton Oyate Health Care Center (101701)
  Spirit Lake Health Center (101310)
  Wagner Health Center (102101)
  Winnebago Hospital (102001)
ALBUQUERQUE AREA (20,25,27,29)
  Acoma-Canoncito-Laguna Hospital (202201)
  Albuquerque Administration (200000)
  Albuquerque Indian Dental Clinic (200021)
  Albuquerque Indian Health Center (202112)
  Dulce Health Center (202810)
  Mescalero Hospital (202301)
  Santa Fe Hospital (202401)
  Southern Colorado Ute Service Unit (202611)
  Taos-Picuris Health Center (202912)
  Zuni Hospital (202501)
BEMIDJI AREA (11,14,16,18)
  Cass Lake Hospital (112601)
  Redlake Hospital (113201)
  White Earth Health Center (113510)
BILLINGS AREA (40,45,47,49)
  Browning Hospital (404101)

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Report Options	
Report Type:	
Location:	
Section(s):	
Reporting Period:	
Answer:	☐ Yes ☐ No ☐ N/A
Has Explanation:	○ Yes ○ No ◉ All
	Generate Report

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Report Options

Report Type:	2: Completion Status Report for Active Facilities
Location:	Select IHS Facility
Section(s):	All Sections
	1 - Facility Specific Procedures
	2 - IT Systems
	3 - Patient Registration / Check In
	4 - Benefits Coordination
Reporting Period:	FY 2008 - End of 3rd Quarter
Answer:	☐ Yes ☐ No ☐ N/A
Has Explanation:	○ Yes ○ No ⦿ All
	Generate Report

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Location:	Select IHS Facility
Section(s):	All Sections
	1 - Facility Specific Procedures
	2 - IT Systems
	3 - Patient Registration / Check In
	4 - Benefits Coordination
Reporting Period:	FY 2008 - End of 3rd Quarter
Answer:	FY 2008 - End of 3rd Quarter
	FY 2008 - End of 4th Quarter
Has Explanation:	FY 2009 - 1st and 2nd Quarter
	FY 2009 - 3rd and 4th Quarter

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Report Type:	1: All Answers for Active Facilities
Location:	Albuquerque Administration (200000)
Section(s):	All Sections 1 - Facility Specific Procedures 2 - IT Systems 3 - Patient Registration / Check In 4 - Benefits Coordination
Reporting Period:	FY 2008 - End of 3rd Quarter
Answer:	☐ Yes ☐ No ☐ N/A
Has Explanation:	○ Yes ○ No ◉ All
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All Answers for Active Facilities Report for Reporting Period FY 2008 - End of 3rd Quarter
For the following location: Albuquerque Administration Facility (200000)
Report generated on 03/17/2010

All Answers for Active Facilities Report

ALBUQUERQUE - Albuquerque Administration

Section 2		Answer
3	a. Is the access to RPMS table maintenance restricted?	Yes
8	1. Please provide electronic copy of ASM and PSR for most recent month end and any other tracking/trending documentation or reports you have for the previous two months.	Supporting Documentation

Section 3		Answer
9	a. Is third party eligibility and patient data being verified at each encounter? (This includes adding the data into RPMS)	N/A
10	Please review 5 random patients to see if updates were done at each time of service. Were the patients updated at each time of Service.	N/A
11	b. Are you currently running PIMS?	Yes
12	c. Do you have a Policy for collecting payments Seeing Non-Indian Beneficiaries?	N/A

Section 4		Answer
16	a. Does your facility review the Benefit Coordinator Productivity Report?	Yes
17	Do you have documentation/evidence of supervisory review for at least the past 6 months?	Yes

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Report Options	
Report Type:	1: All Answers for Active Facilities
Location:	Albuquerque Administration (200000)

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Core Reports

Completion Status for Active Facilities Report for Reporting Period FY 2008 - End of 3rd Quarter For the following location: ABERDEEN AREA (10,15,17,19) Report generated on 03/17/2010

Completion Status for Active Facilities - Summary Data

Location	Completed	
	Sections	Location
ABERDEEN		NO
Cheyenne River (101001)	5	NO
Crow Creek (101430)	11	YES
Pine Ridge Hospital (101501)	10	YES
Quentin N. Burdick Memorial Health Facility (101901)	7	NO
Rapid City GMS (100901)	11	YES
Rosebud Hospital (101601)	11	YES
Sisseton-Wahpeton Oyate Health Care Center (101701)	0	NO
Spirit Lake Health Center (101310)	11	YES
Wagner Health Center (102101)	10	YES
Winnebago Hospital (102001)	11	YES
Percent Complete:		70%

Report Options

Report Type:	2: Completion Status Report for Active Facilities
Location:	ABERDEEN AREA (10,15,17,19)
Section(s):	All Sections 1 - Facility Specific Procedures 2 - IT Systems 3 - Patient Registration / Check In 4 - Benefits Coordination

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**Completion Status for Active Facilities Report for
Reporting Period FY 2008 - End of 3rd Quarter
For the following location: Quentin N. Burdick Memorial Health Facility Facility
(101901)
Report generated on 03/17/2010**

Completion Status for Active Facilities - Summary Data

Location	Completed	
	Sections	Location
ABERDEEN		NO
Quentin N. Burdick Memorial Health Facility (101901)	7 of 11	NO
	Percent Complete:	64%

Report Options

Report Type:	2: Completion Status Report for Active Facilities
Location:	Quentin N. Burdick Memorial Health Facility (101901)
Section(s):	All Sections 1 - Facility Specific Procedures 2 - IT Systems 3 - Patient Registration / Check In 4 - Benefits Coordination
Reporting Period:	FY 2008 - End of 3rd Quarter
Answer:	☐ Yes ☐ No ☐ N/A
Has Explanation:	○ Yes ○ No ● All
	Generate Report

CEO Responsibilities

- CEO has ultimate responsibility for ensuring that the data is submitted
- CEO will assign individuals for each section, should be Subject matter experts for each field, i.e., IT section should be assigned to IT manager, Billing-Business Office Manger
- CEO section will be assigned to the CEO to answer
- Verifying all data in each section are complete and accurate

Area Director Responsibilities

- Ensure that all Facility CEO's are aware of the Online Tool submission dates and complete within the deadline.
    - 1st and 2nd Quarter April 1st to May 1st
    - 3rd and 4th Quarter October 1st to November 1st
- Pass along updates, facility status, and follow up items, i.e., Red Flagged Items and general items of concern/clarification, in a timely manner.
- Approve any Formal Corrective Action Plans submitted by Service Units appearing on the Red Flagged list.
    - Submitting an Approved Corrective Action Plan to ORAP/DBOE
    - Ensure that all Corrective Action Plans are implemented, and followed up on

Tools

- Third Party Internal Controls Policy
- Third Party Internal Controls Policy Online Tool User Manual
  - http://www.ihs.gov/NonMedicalPrograms/BusinessOffice/documents/3rd_party_Self_Assessment_IHPES.pdf
- Business Office Web site
  - http://www.ihs.gov/NonMedicalPrograms/BusinessOffice/