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 followup 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.
 - Item # 1: 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)
 - Item # 3: Facilities that Have a Backlog of 30 Days or More In Billing (inpatient)
 - Item # 4: 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
 - Item # 6: 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

 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

 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

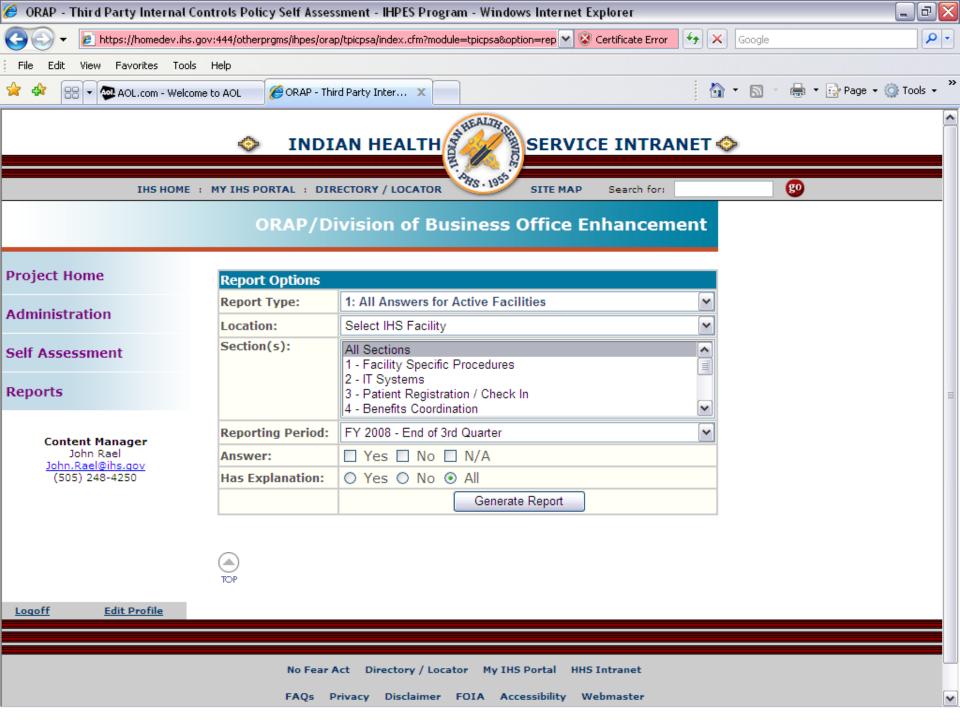
_	Aberdeen	1162
_	Albuquerque	1487
_	Bemidji	1588
_	Billings	2525
_	Nashville	339
_	Navajo	1036
_	Oklahoma	1687
_	Portland	2189
_	Phoenix	1432
_	Tucson	1542
_	IHS Average	1498

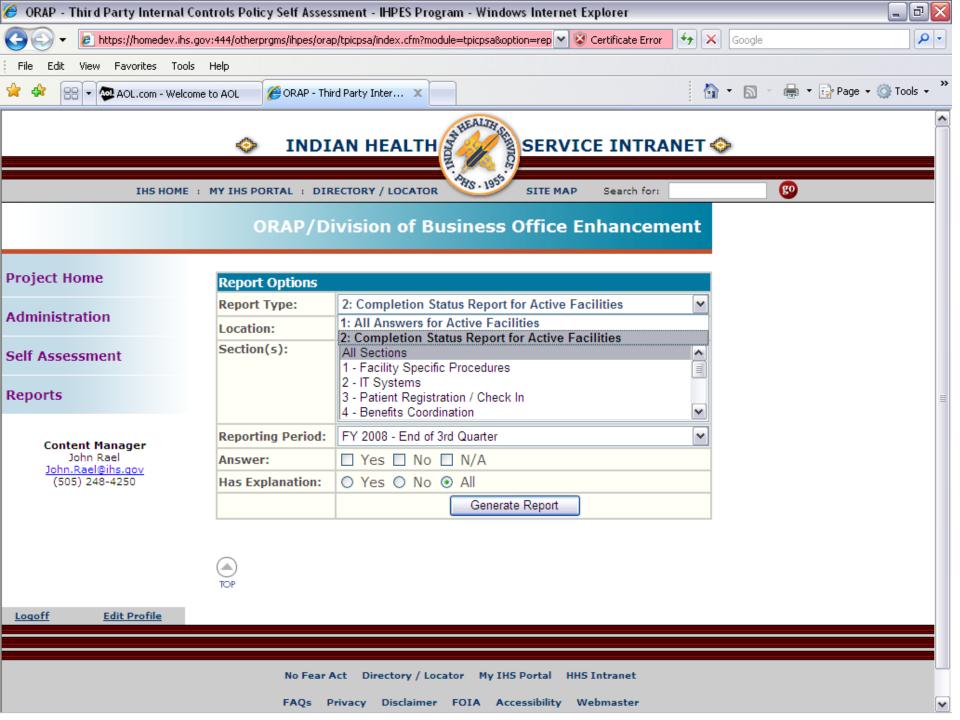
 Please provide the Total Number of coders at your facility. And please provide the Average Number of visits at your facility per month that are coded. Based on this, we calculated number of visits coded per coder FY2009 1st and 2nd Q data call

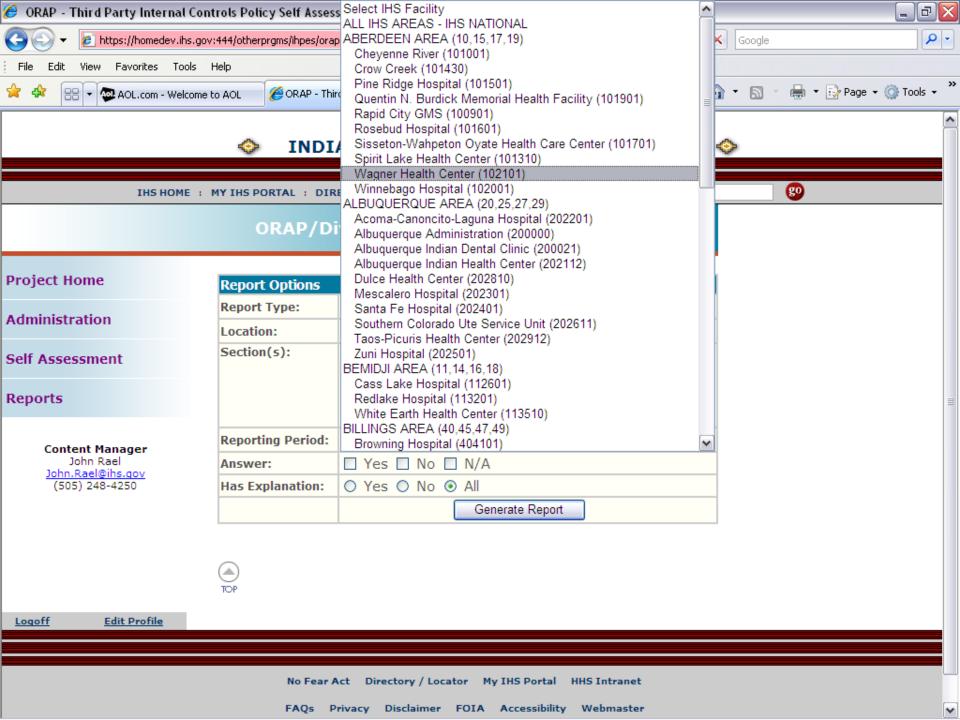
_	Aberdeen	1149
_	Albuquerque	1183
_	Bemidji	2852
_	Billings	1878
_	Nashville	600
_	Navajo	888
_	Oklahoma	1391
_	Portland	1534
_	Phoenix	1906
_	Tucson	1543
_	IHS Average	1290

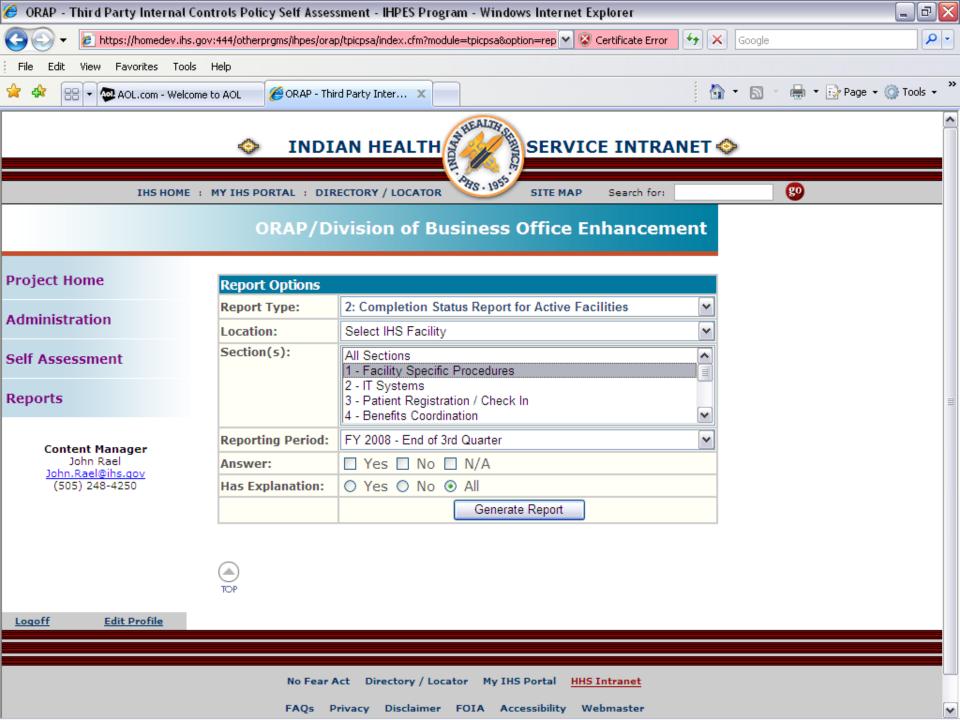
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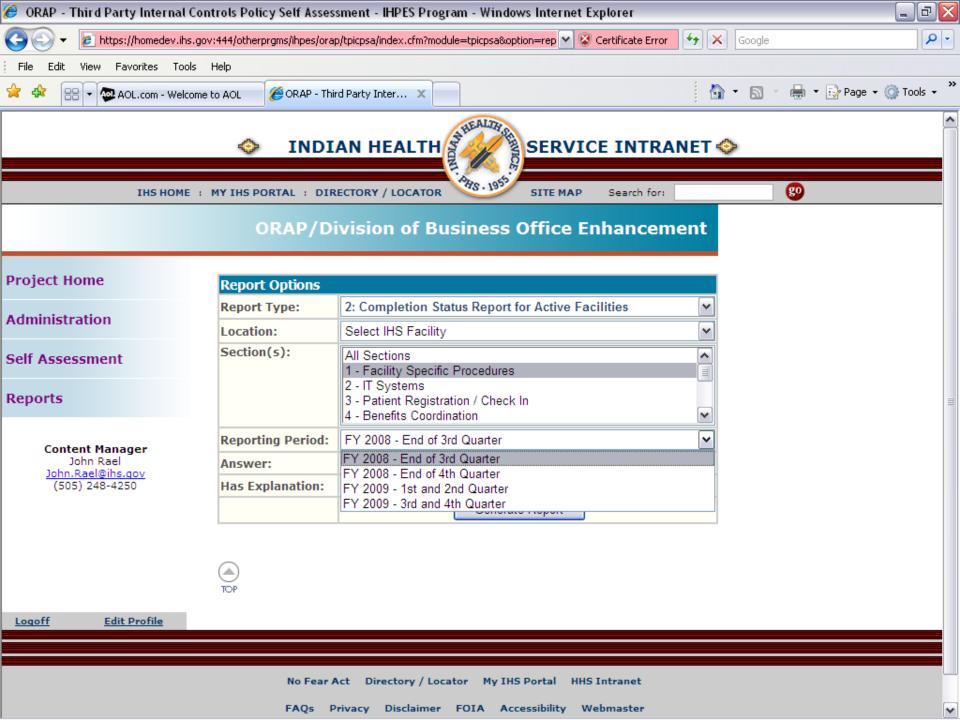
_	IHS Average	1315
_	Tucson	1619
_	Phoenix	1626
_	Portland	1904
_	Oklahoma	1306
_	Navajo	898
_	Nashville	700
_	Billings	1689
_	Bemidji	2281
_	Albuquerque	1390
_	Aberdeen	1168

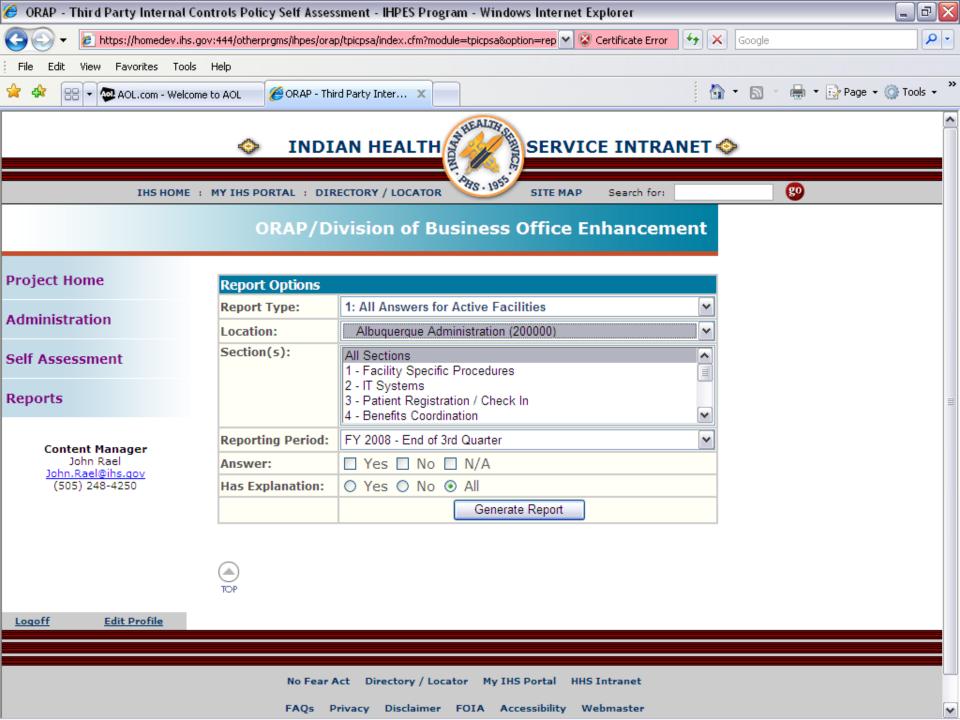


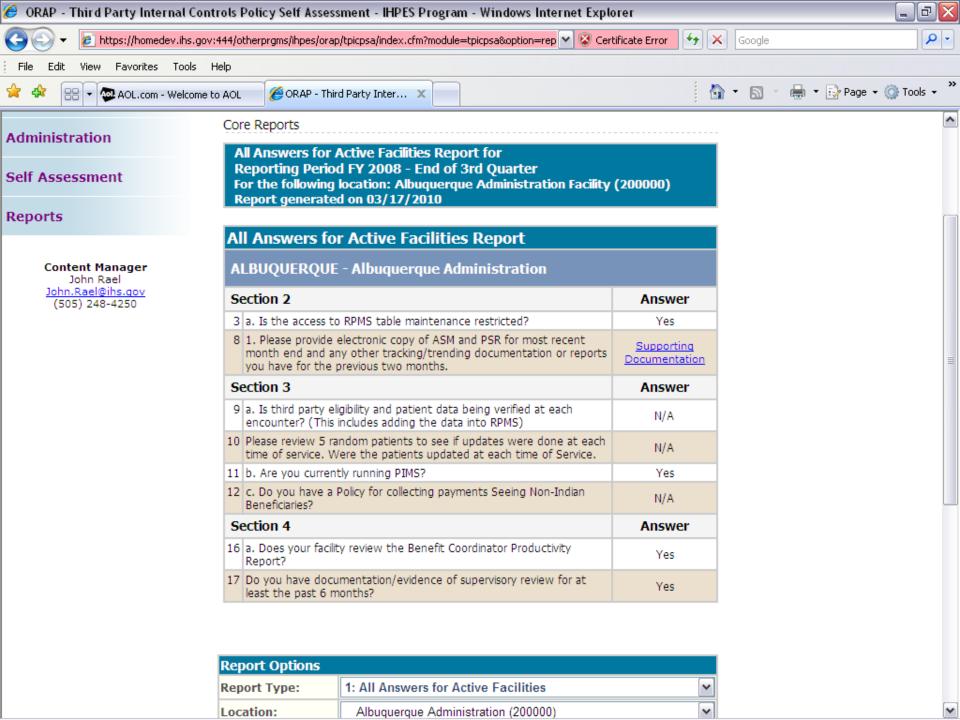


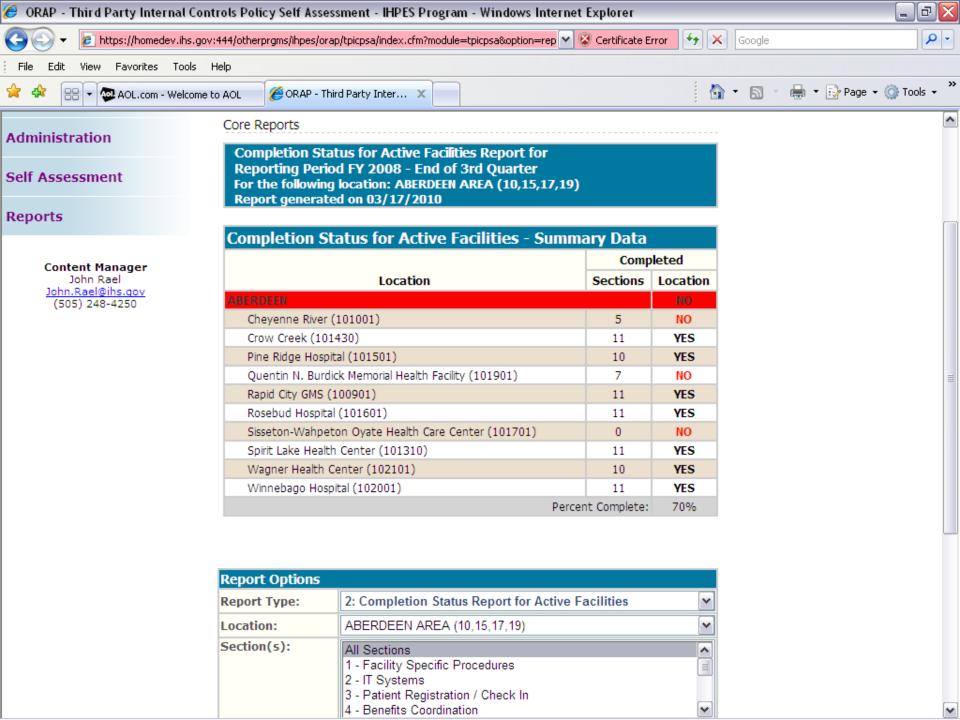


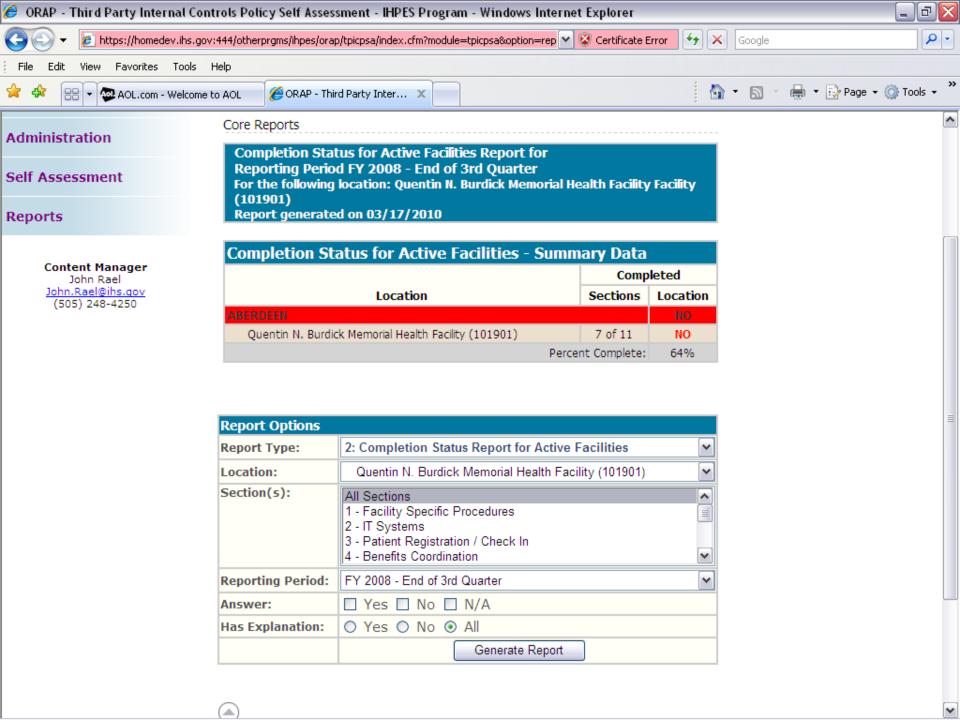












CEO Responsibilities

- 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/