Compliance in IHS

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Objectives

- Understanding of IHS Compliance: past, present, future
- Acronym Meaning
- Steps of successful compliance plan
- Your role in Compliance

Why Compliance?

- Indian Health Service *not* unnoticed
- Healthcare waste, fraud, and abuse affects public and private payors

COST of Healthcare

- Health Care Expenses Continue to rise
  - $ 1.425 Trillion in 2001
  - $ 2.8 Trillion by 2011
- Retirement of the "Baby Boomers"

IHS Compliance History

- 1976 mainly *internal* through:
    - Indian Health Manual
    - Budget
    - Contract Health Service (CHS)

IHS Compliance History

- After 1976 – Indian Health Care Improvement Act
  - External Regulators: CMS, OIG, OCR…
  - Financial Interest – Third-Party Payors
- IHS Internal – Indian Health Manual
  - Organization Compliance Plans
  - Internal Control Policy

IHS Compliance Emerging

- Beneficiaries/Public are astute and willing to file complaints
- Office of the Inspector General (OIG) audits increased over the years
  - Credentialing
  - Cost Reports
  - Tribal Contracts
  - OIG Workplan includes IHS
- OIG Investigation

Emerging Compliance

- External/Internal Compliance
  - Centers for Medicare and Medicaid Services, Quality Improvement Organization
  - Division of Regulatory Affairs – Medicaid audits
  - **OIG Health Insurance Portability and Accountability Act security audit**
  - Government Performance and Results Act
  - Compliance includes quality of care: accreditation validation (WFA)
  - Compliance Plans

OIG Compliance Guidelines

1. Policies and Procedures/Standards of Conduct
2. Compliance Officer and Committee
3. Effective Training and Education
4. Effective Lines of Communication
5. Enforce Standards – Known Disciplinary Guidelines for *Everyone*

OIG Guidelines (continued)

1. Auditing and Monitoring
2. Responding to Waste, Fraud, and Abuse
   – Corrective Action Initiatives

Acronyms

- CMS – Center for Medicare and Medicaid Services
- DRA – Deficient Reduction Act
- GPRA – Government Performance and Results Act
- HIPAA – Health Insurance Portability and Accountability Act
- OCR – Office of Civil Rights
- OIG – Office of the Inspector General
- QIO – Quality Improvement Organization
- WFA – Waste, Fraud and Abuse

Summary

- Understand your compliance role
  - DHHS Code of Conduct
  - Professional Code of Conduct
  - Report concerns
  - Attend compliance training

Summary

- Report Compliance Concerns
  - Supervisor
  - Compliance Officer
  - OIG, DHHS, IHS Hotline
- Jan's Contact Information:

  Work Phone: 520-295-2477

  Email: Janice.Chase@ihs.gov

Web Sites

- ## IHS PIES:
  - www.ihs.gov/NonMedicalProrgrams/pies-report-fraud.asp

- ## OIG:
  - www.OIG.gov

- ## AHIMA:
  - www.AHIMA.org

- ## AAPC:
  - www.AAPC.com