PrimeWest Health

Corporate Compliance
Corporate Compliance Department

- PrimeWest Health’s Compliance department does the following:
  - Articulates PrimeWest Health’s commitment to complying with all applicable Federal and State standards
  - Demonstrates PrimeWest Health’s commitment to the highest levels of ethical decision-making and accountability
  - Maintains adherence to PrimeWest Health policies and procedures
  - Maintains adherence to Health Insurance Portability and Accountability Act (HIPAA) privacy and security standards
  - Prevents, detects, and corrects fraud, waste, and abuse (FWA)
The Compliance Program in Action

PrimeWest Health’s Compliance program has three main goals:

● To prevent illegal acts and minimize the negative effects of illegal acts if they occur

● To minimize the civil liability of the Joint Powers Board (JPB) in the event of an illegal act

● To minimize PrimeWest Health’s exposure to civil liability in the event of an illegal act
Building Blocks of Compliance

PrimeWest Health’s compliance program has seven fundamental elements:

- Written policies, procedures, and code of conduct
- Oversight (Corporate Compliance Officer, Compliance and Data Privacy & Security Oversight Committee [CDPSOC], and JPB)
- Effective training and education
- Effective lines of communication
- Well-publicized disciplinary standards and procedures encouraging compliance program participation
- Effective system for routine monitoring and identification of compliance risks
- Procedures and systems for prompt responses to compliance issues
Compliance: a Shared Responsibility

The compliance program is overseen by the following:

- JPB
- CDPSOC
- Chief Executive Officer (CEO)
- Corporate Compliance/HIPAA Privacy Officer
- Corporate Compliance Team
  - Coordination
  - Surveillance and Integrity Analysis
General Compliance Activities

- Maintaining and overseeing an effective compliance program
- Developing compliance policies and procedures and a code of conduct
- Developing an annual work plan
- Developing annual auditing and a monitoring work plan
- Maintaining a tracking system for all regulatory reporting
- Developing effective trainings and educations
- Overseeing internal and external corrective action plans
- Overseeing HIPAA privacy
- Maintaining effective lines of communication for reporting suspected integrity variances (Compliance Hotline)
- Reporting to the CDPSOC on a quarterly basis
- Assisting in all regulatory audits
Surveillance Activities

- Assessing operational areas of compliance risks
- Data mining
- Identifying trends and issues that emerge from compliance reports and external agencies such as the Centers for Medicare & Medicaid Services (CMS) and the Office of Inspector General (OIG)
- Unannounced/announced provider compliance audits
- Conducting internal compliance audits
- Conducting compliance FWA investigations
- Performing risk assessment and mitigation
- Working with Provider Network Administration and Quality & Utilization Management departments to tighten quantity limits and develop front-end edits in our claims systems
- Reviewing CMS provider FWA alerts for their effects on PrimeWest Health