Corporate Compliance Report

Audit & Compliance Committee of the CCH Board of Directors

June 21, 2021
Meeting Objectives

Review

Highlights of 1st 6-Months of County FY 2021

- Contacts by Category
  - Cook County Health System Compliance Program
  - CountyCare Medicaid Health Plan Compliance Program
    - Recoveries (based on State Fiscal Year)
FY 2021 Contacts by Category

CCH System Compliance Program Q1 and Q2

12/01/2020 – 05/31/2021

<table>
<thead>
<tr>
<th>Categories</th>
<th>2021</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Privacy/Security (HIPAA)</td>
<td>134</td>
<td>35%</td>
</tr>
<tr>
<td>Documentation</td>
<td>75</td>
<td>19%</td>
</tr>
<tr>
<td>Regulatory/Policy</td>
<td>70</td>
<td>18%</td>
</tr>
<tr>
<td>Human Resources</td>
<td>34</td>
<td>9%</td>
</tr>
<tr>
<td>Contracts</td>
<td>33</td>
<td>9%</td>
</tr>
<tr>
<td>Conflict of Interest</td>
<td>6</td>
<td>1%</td>
</tr>
<tr>
<td>Fraud Waste &amp; Abuse</td>
<td>13</td>
<td>3%</td>
</tr>
<tr>
<td>Research¹</td>
<td>6</td>
<td>2%</td>
</tr>
<tr>
<td>Other</td>
<td>14</td>
<td>4%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>385</strong></td>
<td></td>
</tr>
</tbody>
</table>

¹ Historically agreements/contracts included research related activity. As we develop a Research Compliance Program it is beneficial to separate the activity for tracking purposes.
FY 2021 Contacts by Category

CountyCare Health Plan Compliance Program

12/01/2020 – 05/31/2021

<table>
<thead>
<tr>
<th>Categories</th>
<th>2021</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fraud Waste &amp; Abuse</td>
<td>100</td>
<td>41%</td>
</tr>
<tr>
<td>Privacy/Security (HIPAA)</td>
<td>87</td>
<td>36%</td>
</tr>
<tr>
<td>Contracts</td>
<td>24</td>
<td>10%</td>
</tr>
<tr>
<td>Regulatory/Policy</td>
<td>16</td>
<td>7%</td>
</tr>
<tr>
<td>Documentation</td>
<td>3</td>
<td>1%</td>
</tr>
<tr>
<td>Other</td>
<td>13</td>
<td>5%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>243</strong></td>
<td></td>
</tr>
</tbody>
</table>

The majority, 91% of the Fraud Waste & Abuse activity is directly attributed to the Department of Healthcare and Family Services (HFS) Office of Inspector General provider notifications and requests for information.
# CountyCare Compliance Recoveries

## State Fiscal Year (S-FY) 2020 through S-FY 2021 Q3

### Retrospective Recoveries

<table>
<thead>
<tr>
<th>S-FY</th>
<th>Reporting Period</th>
<th>Overpayments Identified</th>
<th>Overpayments Collected</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020</td>
<td>07/01 - 06/30/2020</td>
<td>$7,158,000</td>
<td>$5,370,000</td>
</tr>
</tbody>
</table>

### Proactive Preventative Loss

<table>
<thead>
<tr>
<th>S-FY</th>
<th>Reporting Period</th>
<th>Overpayments Collected</th>
</tr>
</thead>
<tbody>
<tr>
<td>2021</td>
<td>Q1 07/01 - 09/30/20</td>
<td>$333,400</td>
</tr>
<tr>
<td>2021</td>
<td>Q2 10/01 - 12/31/20</td>
<td>$716,000</td>
</tr>
<tr>
<td>2021</td>
<td>Q3 01/01 - 03/31/21</td>
<td>$1,112,186</td>
</tr>
</tbody>
</table>

### Administrative Policies Not Followed

Failure to Comply with Payment Holds for a Specific Code Qualified Medicare Beneficiary program code (QMB 09)

- Potential Recovery: $9,675,000
- Actual Recovery: $7,307,349
  - $2,367,651 – attributed to operational negotiations that resulted in settlements for older dates of service not quantified here.

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3 Recoupments placed on hold due to the Public Health Emergency; HFS allowed to resume recoupment on 10/31/2020; notice to Benefit Administrators 11/2020; notice to Providers 12/2020; initial recoveries restarted in February 2021.
Questions?