



Corporate Compliance Report

Audit & Compliance Committee of the CCH Board of Directors

August 2, 2024



COOK COUNTY
HEALTH

Meeting Objectives

Review

Highlights of 1st and 2nd Q County FY 2024

- System Compliance Program
- CountyCare Medicaid Health Plan Compliance Program
 - Recoveries

Privacy Update

Metrics

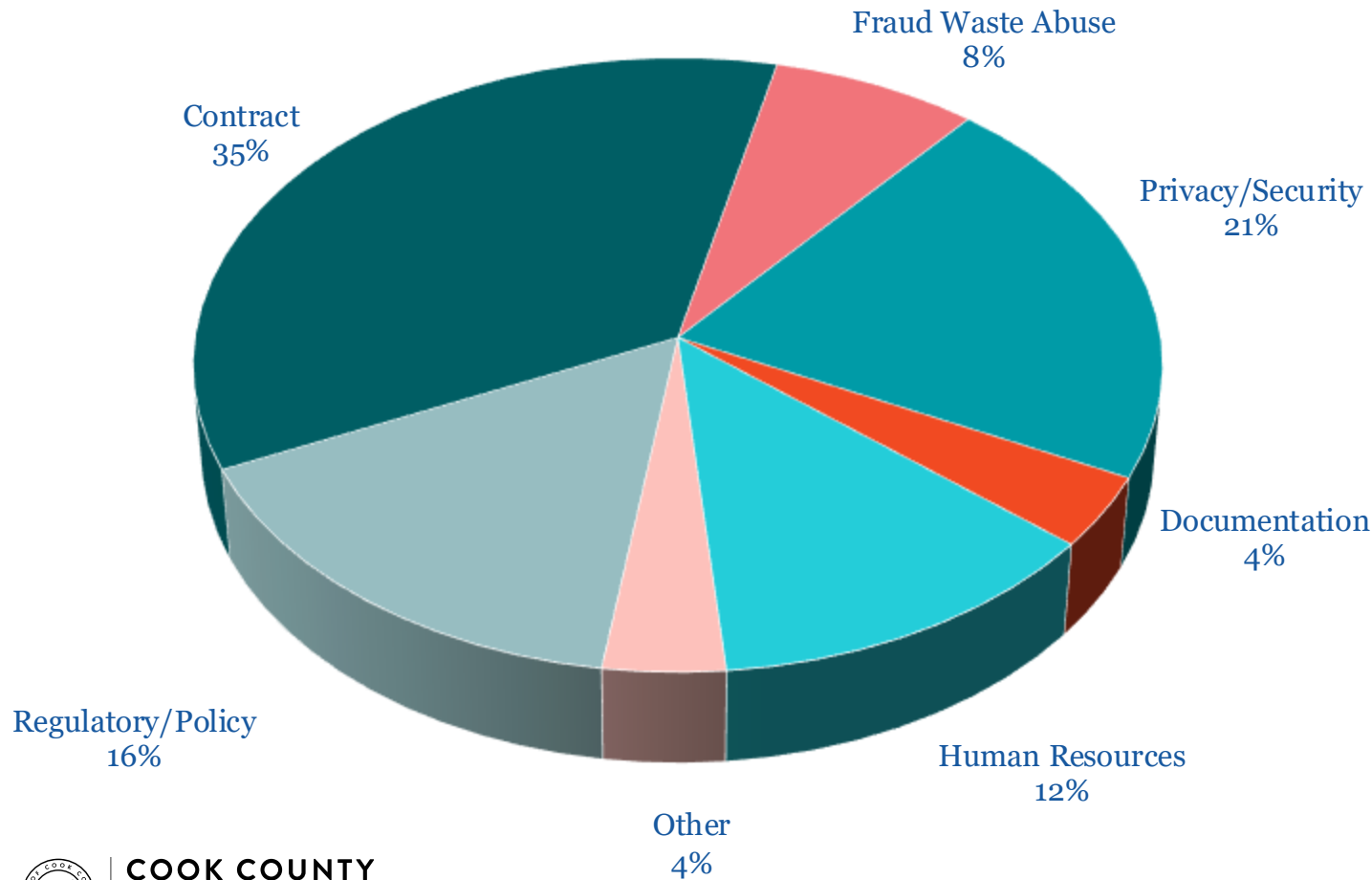


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Q1-Q2 CFY 2024 Contacts by Category

CCH System Compliance Program

12/01/2023 – 05/31/2024

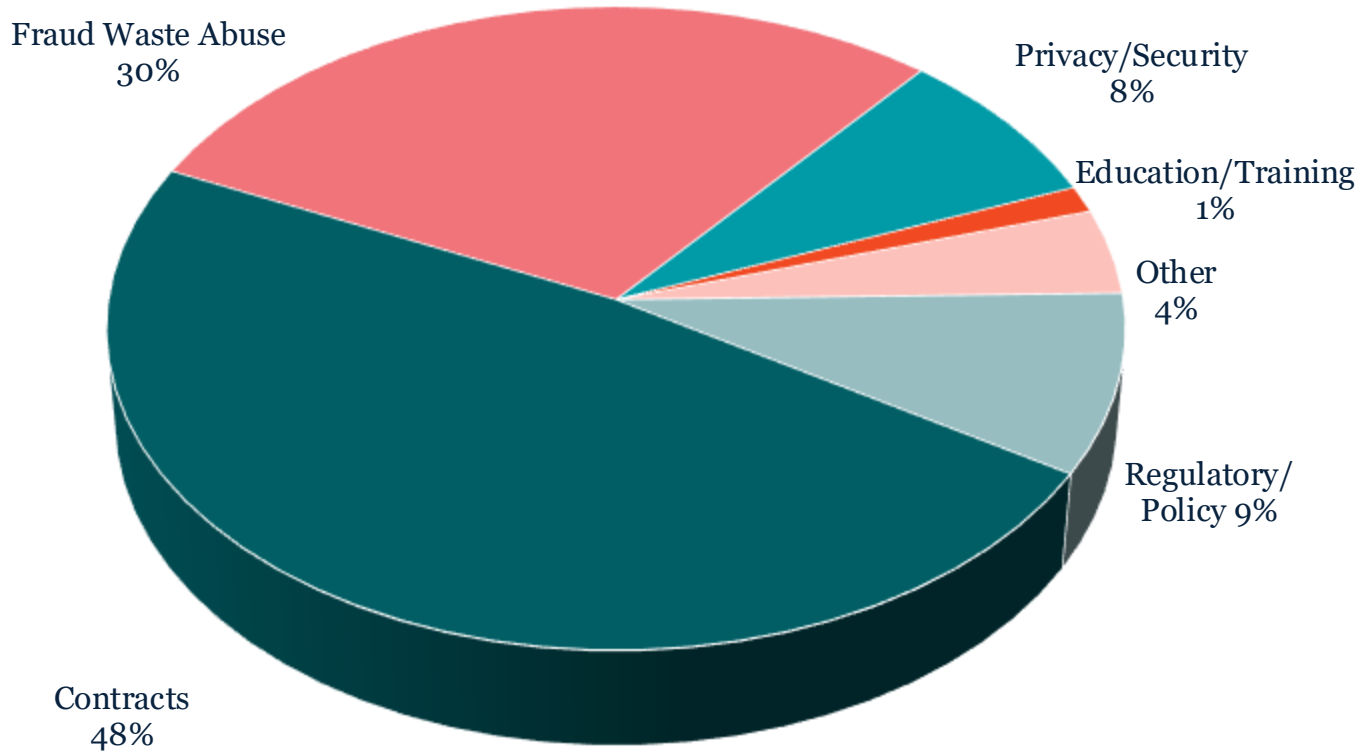


Categories	2024		2023
	Count & % of Total Contacts		% of Total Contacts
Contracts	179	35%	51%
Privacy/Security (HIPAA)	107	21%	15%
Regulatory/Policy	80	16%	12%
Human Resources	63	12%	9%
Fraud, Waste & Abuse	38	8%	4%
Documentation	19	4%	6%
Other (Quality, Research)	19	4%	2%
	505		

Q1-Q2 CFY 2024 Contacts by Category

CountyCare Compliance Program

12/01/2023 – 05/31/2024



Categories	2024		2023
	Contact Count & % of Total Contacts	% of Total Contacts	
Fraud Waste & Abuse ¹	110 30%	38%	
Privacy/Security (HIPAA)	30 8%	11%	
Contracts	181 48%	40%	
Regulatory/Policy	34 9%	6%	
Education and Training ²	5 1%	0% ²	
Other (Conflict of Interest, Documentation, Human Resources, Quality)	16 4%	5%	
	376		

¹ The majority of 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.

² This category was not previously tracked separately in past years

CountyCare Compliance Recoveries

State Fiscal Year (S-FY) 2023 through S-FY 2024 Q3

Retrospective Recoveries

S-FY	Reporting Period	Overpayments Identified ³	Overpayments Collected
2023	07/01/2022 -06/30/2023	\$ 4,427,873	\$ 6,968,262

S-FY	Reporting Period	Overpayments Identified	Overpayments Collected
2024	<u>Q1</u> 07/01 -09/30/23	\$ 1,226,051	\$ 836,559
2024	<u>Q2</u> 10/01 – 12/31/23	\$ 5,577,235	\$ 368,058
2024	<u>Q3</u> 01/01 – 03/31/24	\$ 3,464,387	\$ 3,058,361

Proactive Preventative Loss

S-FY	Reporting Period	Overpayments Avoided
2023	07/01/2022 -06/30/2023	\$ 1,676,545

S-FY	Reporting Period	Overpayments Avoided
2024	<u>Q1</u> 07/01 -09/30/23	\$ 30,490
2024	<u>Q2</u> 10/01 – 12/31/23	\$ 145,463
2024	<u>Q3</u> 01/01 – 03/31/24	\$ 378,316

³The **Overpayments Identified** column indicates the currently outstanding amount that has been paid to a provider for identified inaccurate codes. These amounts may be supported through additional review of documentation submitted by the provider or may be offset if a provider elects to bill a corrected claim. The amount that is identified as an overpayment may also change if the provider is able to successfully appeal the audit/investigations findings (for example, if they are able to produced additional documentation to support their claim).

Privacy at CCH



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Status of Recent Vendor Privacy/Security Incidents

- **Superior Ambulance:**

- Impact: final data still being finalized
- Status: awaiting final data, then notices will be mailed to all affected patients and all required regulators will be noticed

- **MHN/MHNU:**

- Impact: fewer than 700
- Status: all member notices mailed, all regulators noticed. Substitute notice to be removed from CountyCare website on July 15, 2024

- **Dialysis Care Center/Gaia**

- Impact: ~176 patients
- Status: all patient notices mailed, all regulators noticed. Receiving weekly status reports on call center and any returned mail

- **Change Healthcare:**

- Impact: unknown at this time. CountyCare's vendor Avesis notified that CountyCare member data likely impacted
- Status: opted in to Change providing notices on our behalf, per guidance and permission from OCR

- **Perry Johnson & Associates:**

- Impact: ~1.2 million patients
- Status: all patient notices mailed, all regulators noticed



Ramping Up Privacy Education

Recognizing an uptick in privacy issues across the healthcare landscape, Compliance has increased targeted privacy education on a monthly basis including:

- CountyCare Lunch and Learn to review privacy nuances for the health plan Part 2 memo to affected areas/providers on new Part 2 regulations
- Review of psychotherapy note processes and staff education on requirements for mental health and psychotherapy notes and release of information
- Education for department leaders on new Filming/Recording policy updates
- Email reminders and education for Smartsheet users
- HIPAA refresher training for lab managers

Questions? ↗



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