

Corporate Compliance Report

Audit & Compliance Committee of the CCH Board of Directors

October 18, 2024



COOK COUNTY
HEALTH

Meeting Objectives

- Compliance Program Overview
 - Review and Approve Audit & Compliance Committee Charter

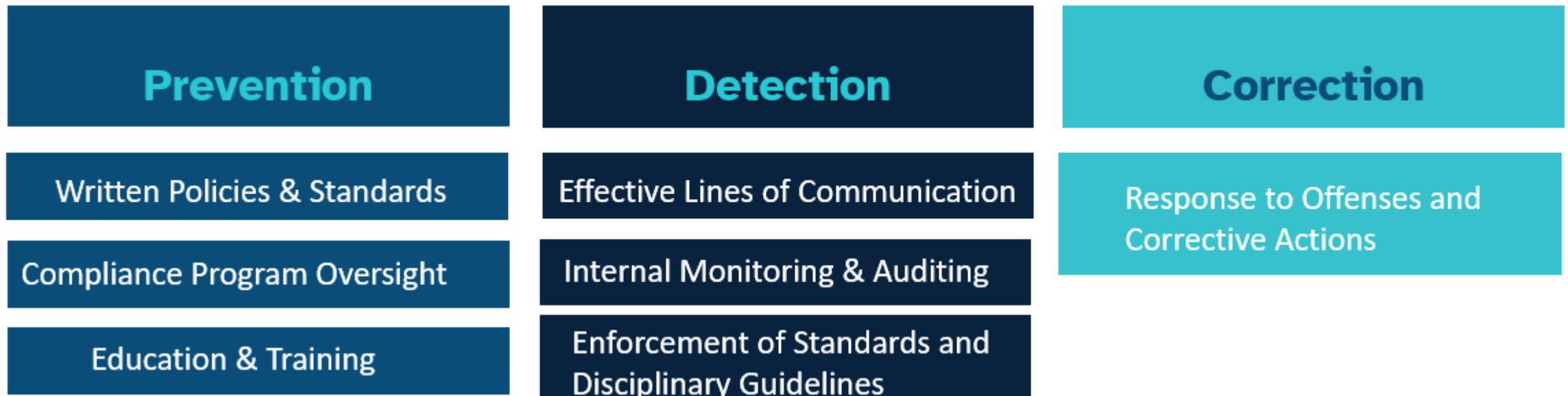
- Metrics
 - System Compliance Program
 - CountyCare Medicaid Health Plan Compliance Program
 - Recoveries

Compliance Program Overview



CCH Compliance Program Structure

The main purpose of the CCH Compliance Program is to **prevent** violations of laws, regulations or internal policy, **detect** violations as they happen and **correct** any issues that could lead to future violations.



Q1-Q3 CFY 2024 CCH System CountyCare Compliance Program



- Last approved 10/20/2023
- Review and Approve



Category: CHARTER POLICY		
Subject: CHARTERS FOR THE BOARD OF DIRECTORS	Page: 1 of 4	
Title: AUDIT & COMPLIANCE COMMITTEE OF THE BOARD OF DIRECTORS CHARTER	Approval Date:	Posting Date:

This document sets forth the duties and responsibilities, and governs the operations of the Audit & Compliance Committee of the Board of Directors of Cook County Health (CCH).

PURPOSE

CCH Chief Executive Officer (CEO) and the Board of Directors (Board) are committed to the proper oversight of our Audit and Compliance programs. In furtherance of this objective, the Board initiated an Audit and Compliance Committee (Committee)¹ composed of independent directors.

The purpose of the Committee is to provide oversight to the CCH internal audit and corporate compliance programs and monitor that systems are in place to ensure the quality of information used by the Board of CCH or by external agencies to evaluate the fiscal affairs and regulatory compliance. Additionally, the Audit and Compliance Committee will provide oversight to ensure the Board of Directors and management of CCH establishes a culture based on honesty and integrity.

The Committee shall advise the Board in matters relating to:

- 1) the integrity of CCH financial reporting;
- 2) the effectiveness of CCH internal controls;
- 3) the performance and effectiveness of CCH internal audit and corporate compliance programs;
- 4) the implementation of standards and processes to promote professional responsibility and honest behavior; and
- 5) the compliance with regulatory requirements, as they relate to CCH corporate compliance.

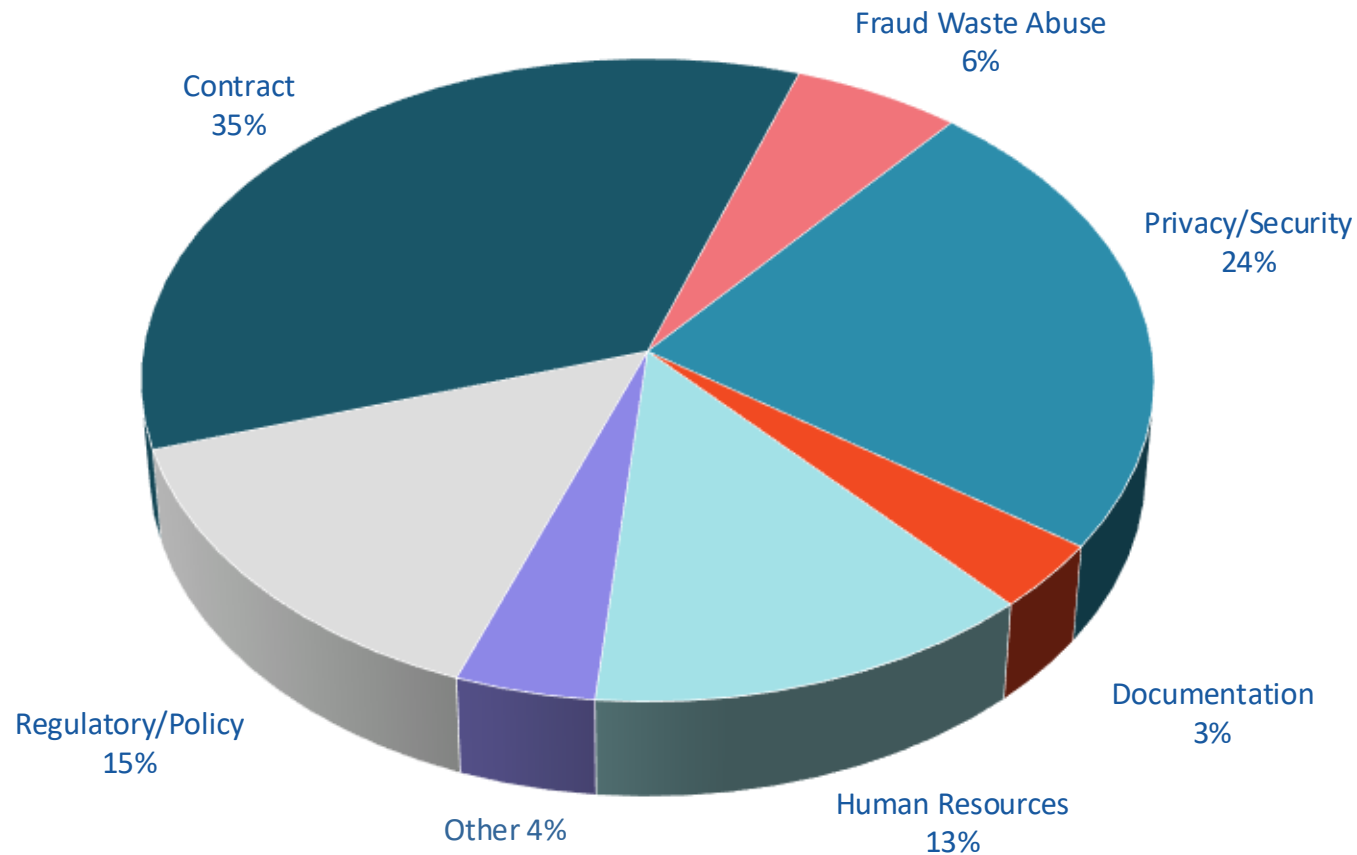
CCH Provider Metrics

Q1-Q3 CFY 2024 Activities by Category



Q1-Q3 CFY 2024 CCH System Compliance Program

12/01/2023 –08/31/2024



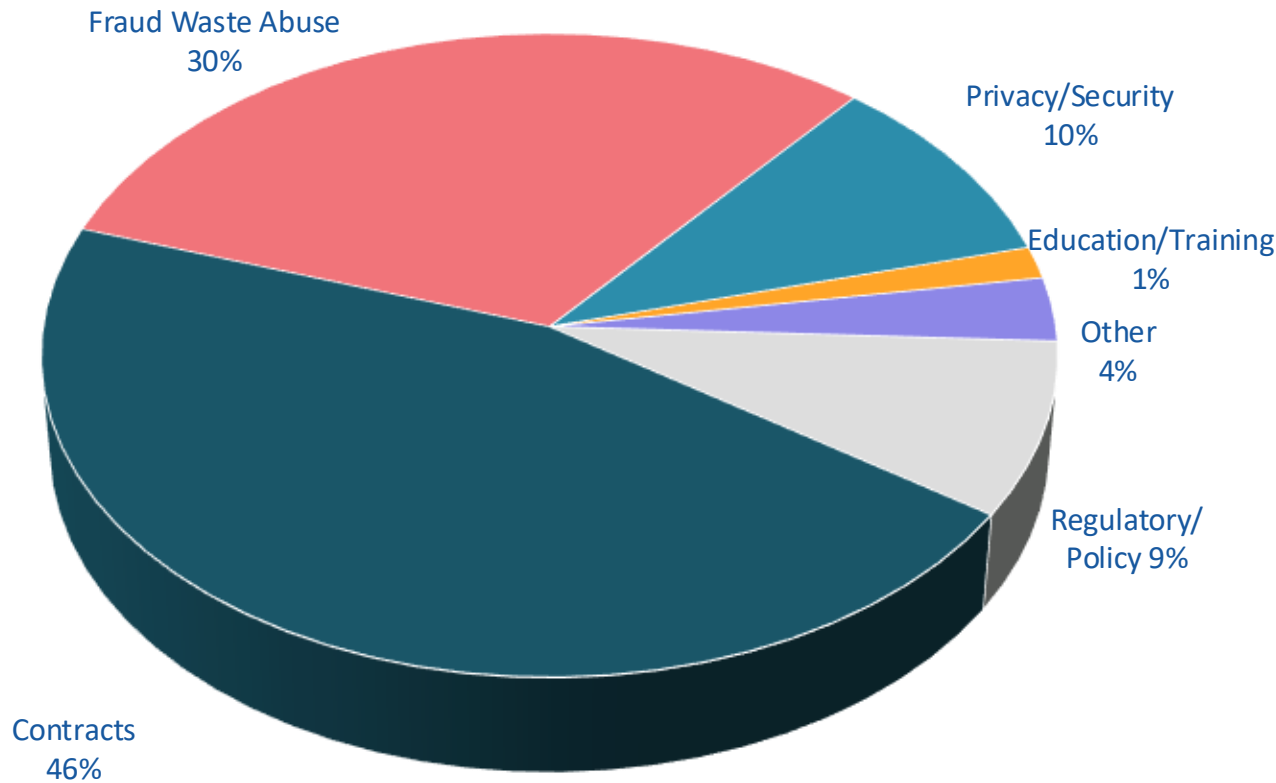
Categories	2024		2023
	Count & % of Total Contacts		% of Total Contacts
Contracts	247	35%	49%
Privacy/Security (HIPAA)	167	24%	14%
Regulatory/Policy	102	15%	13%
Human Resources	93	13%	12%
Fraud, Waste & Abuse	41	6%	3%
Documentation	24	3%	5%
Other (Quality, Research)	29	4%	4%
	703		

CountyCare Metrics
Q1-Q3 CFY 2024 Activities by Category
SFY 2024 CountyCare Recovery Metrics



Q1-Q3 CFY 2024 CCH System CountyCare Compliance Program

12/01/2023 – 08/31/2024



Categories	2024		2023
	Contact Count & % of Total Contacts		% of Total Contacts
Fraud Waste & Abuse ¹	174	30%	35%
Privacy/Security (HIPAA)	55	10%	9%
Contracts	256	46%	44%
Regulatory/Policy	49	9%	7%
Education and Training	9	1%	0% ²
Other (Conflict of Interest, Documentation, Human Resources, Quality)	18	4%	5%
	561		

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 2024 (All Quarters)

Recovery Metrics

Reporting Period S-FY 24	Overpayments Identified	Overpayments Collected
Q4: 04/01 – 06/30/24	\$6,843,883	\$826,895
Q3: 01/01 – 03/31/24	\$3,464,387	\$3,058,361
Q2 10/01 – 12/31/23	\$5,577,235	\$368,058
Q1 07/01 – 09/30/23	\$1,226,051	\$836,559
TOTAL – SFY 2024	\$17,111,556	\$5,089,873
TOTAL – SFY 2023	\$4,257,873	\$6,968,261

Proactive Preventative Loss

Reporting Period	Savings
Q4: 04/01 – 06/30/24	\$1,523,076
Q3: 01/01 – 03/31/24	\$378,316
Q2 10/01 – 12/31/23	\$145,463
Q1 07/01 – 09/30/23	\$30,490
TOTAL – SFY 2024	\$2,077,345
TOTAL – SFY 2023	\$1,676,544

Questions?



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