Effective Case Management

KAISER PERMANENTE.

Marita Janiga

Executive Director, Investigations

National Compliance, Ethics & Integrity Office

Kaiser Permanente

marita.c.janiga@kp.org

Kaiser Permanente

Mission and Vision

Mission   **To provide high-quality, affordable health care services and to improve the health of our members and the communities we serve.**
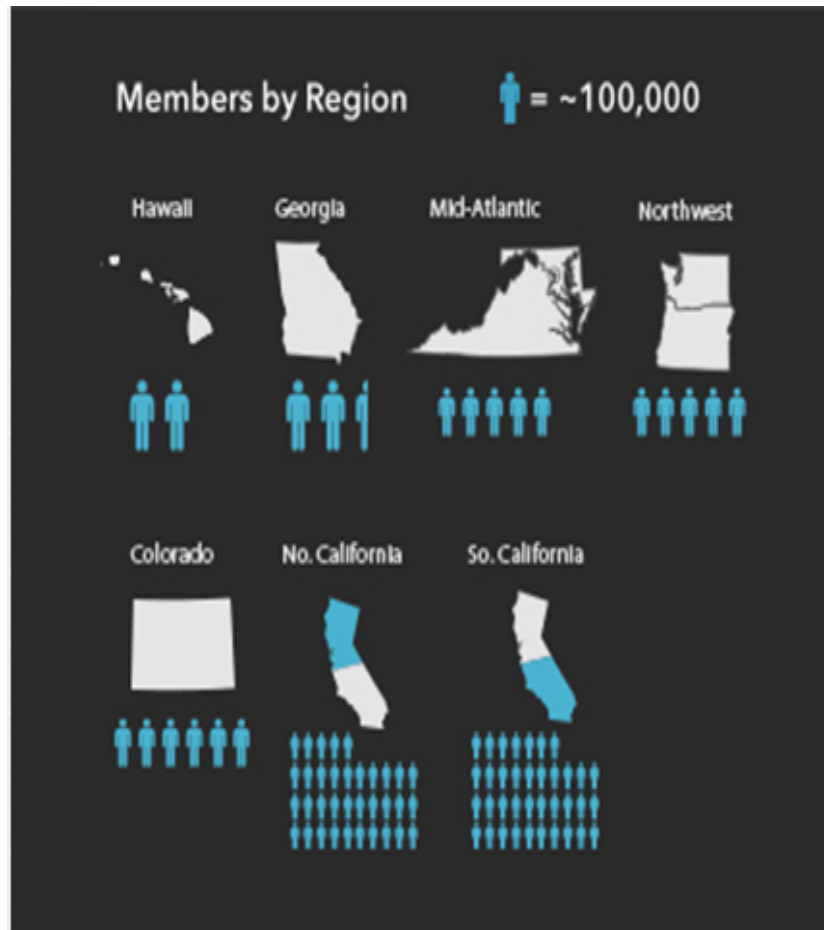
Vision   **To be a leader in total health by making lives better.**

KAISER PERMANENTE®

COMPLIANCE WEEK | CELEBRATING 10 YEARS
MAY 18-20 2015   MAYFLOWER HOTEL   WASHINGTON DC | 2015

Kaiser Permanente

Health Plan Membership – 9.6M

Members by Region 👤 = ~100,000

- **Hawaii**
  231,836
- **Georgia**
  259,834
- **Mid-Atlantic States (VA, MD, DC)**
  530, 275
- **Northwest (OR,WA)**
  504,403
- **Colorado**
  626,523
- **Northern California**
  3,628,380
- **Southern California**
  3,814,946

As of December 31, 2014

Nationally Recognized Quality

Leads the nation in the most No. 1's in Effectiveness of Care Measures

Kaiser Permanente is the only health plan in California to earn the highest rating for overall quality of care in the Healthcare Quality Report Card

Six Kaiser Permanente research centers selected for inclusion in the 13-center Mental Health Research

Kaiser Permanente health plans ranked highest for the 2nd consecutive year among fully insured commercial health plans

Kaiser Permanente has received 37 Stage 7 Hospital Awards for successful electronic health record implementation

"Kaiser Permanente Hospitals Among the Safest in the Nation"

All Kaiser Permanente regions received 5-Star ratings

19 Kaiser Permanente Hospitals listed among the nation's elite in annual "Best Hospitals" rankings
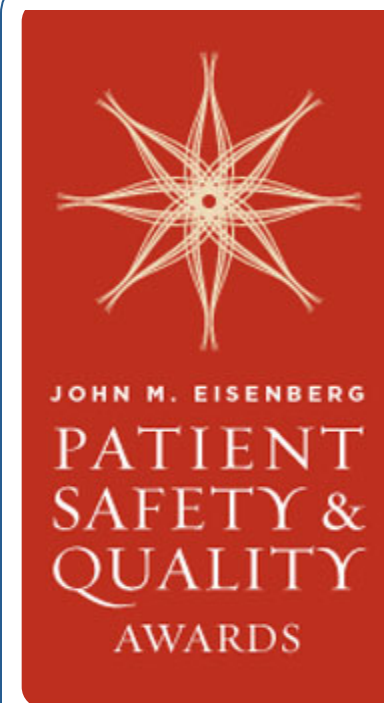
Kaiser Permanente Wins Prestigious Eisenberg Award for Patient Safety and Quality Efforts

Implant registries recognized for contributions to patient safety, quality improvement and cost effectiveness
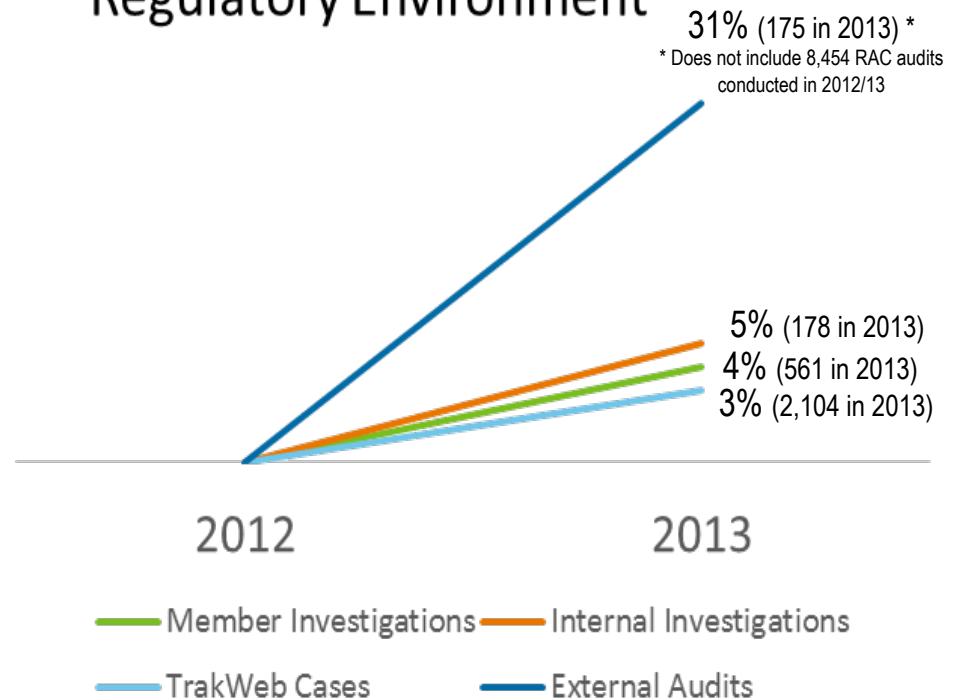
Regulators

More new laws and regulations
Increased investigations, cases, and audits

Regulatory Environment

2012/13:
1,106 new laws & regulations
34,425 pages

31% (175 in 2013) *
* Does not include 8,454 RAC audits conducted in 2012/13

5% (178 in 2013)
4% (561 in 2013)
3% (2,104 in 2013)

2012   2013

— Member Investigations — Internal Investigations
— TrakWeb Cases   — External Audits

KAISER PERMANENTE.

COMPLIANCE WEEK 2015
CELEBRATING 10 YEARS
MAY 18-20 2015   MAYFLOWER HOTEL   WASHINGTON DC

Kaiser Permanente's Compliance Program

Mission

The Kaiser Permanente Compliance, Ethics & Integrity Program supports the Kaiser Permanente mission by:

- Promoting a culture of ethics and integrity.

- Assuring alignment and compliance with laws and regulations, licensing requirements, accreditation standards, and regulator expectations.

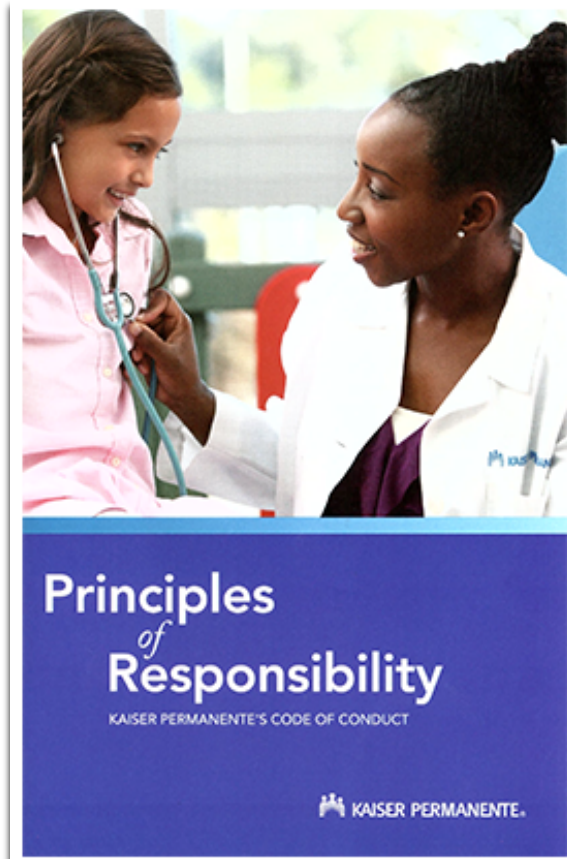- Contributing to the right risk management work efficiently.

Vision

Kaiser Permanente does the right thing by promoting ethics in decision making and integrity in all actions.

Compliance Program

- SVP and Chief Compliance and Privacy Officer Dan Garcia was appointed in 2001 by the board of directors.

- Developed based on Office of Inspector General's Seven Elements of an Effective Compliance Program.

- Many best practices developed over the years.

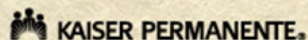# Kaiser Permanente's Code of Conduct

Annual Compliance Training

Three Key Areas

Effective Case Management

Hotline Intake and Triage

Lifecycle of a Case

1 | **YOU** call the KP Compliance Hotline to report concern. 1-888-774-9100

2 | A third-party vendor answers the call, transcribes **YOUR** concern, and gives **YOU** a case reference number to use when following up on your report.

3 | The vendor electronically transmits **YOUR** concern to the National Compliance, Ethics & Integrity Office (NCO).

4 | NCO reviews **YOUR** concern and sends it to the appropriate region, service area, and **Primary Investigator**.

The assignment is based on the potential issue, its severity, and other extenuating circumstances.

5 | The **Primary Investigator** conducts a fair and impartial investigation.

The **Primary Investigator** completes the investigation and communicates the outcome to the assigned **Case Coordinator**.

6 | The **Case Coordinator** prepares and sends a message about the outcome of the investigation to the vendor.

7 | **YOU** call the KP Compliance Hotline and reference **YOUR** case number to obtain the status of your concern.

8 | The vendor reads the investigation outcome to **YOU**.

Intake Methods

Hotline Intake Script Evolution

Privacy
- Initial Script
  - Broad intake, no guidance relating to escalation.
  - All calls stating or involving a privacy matter were being escalated to the business.

Review
- High number of escalated calls were considered low risk to organization which impacted business operations.
- Review with internal privacy SMEs determined escalation criteria could be refined.
- Intake script needed to be revised.
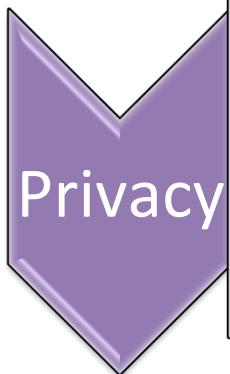
Privacy
- Current script:
  - Does the matter involve loss, theft, or misplacement of protected health information?
    - If yes, how? Depending on the value reported, escalate call to business.
- Script Update
  - Reduced the number of low risk escalated calls.
  - Significantly reduced the impact to vendor and business operations.

Hotline Intake Script Evolution

HR
- Initial Script
  - No prompt guiding callers/reporters to address HR matters locally.
  - All HR calls connected to intake specialist and case imported into case management system.
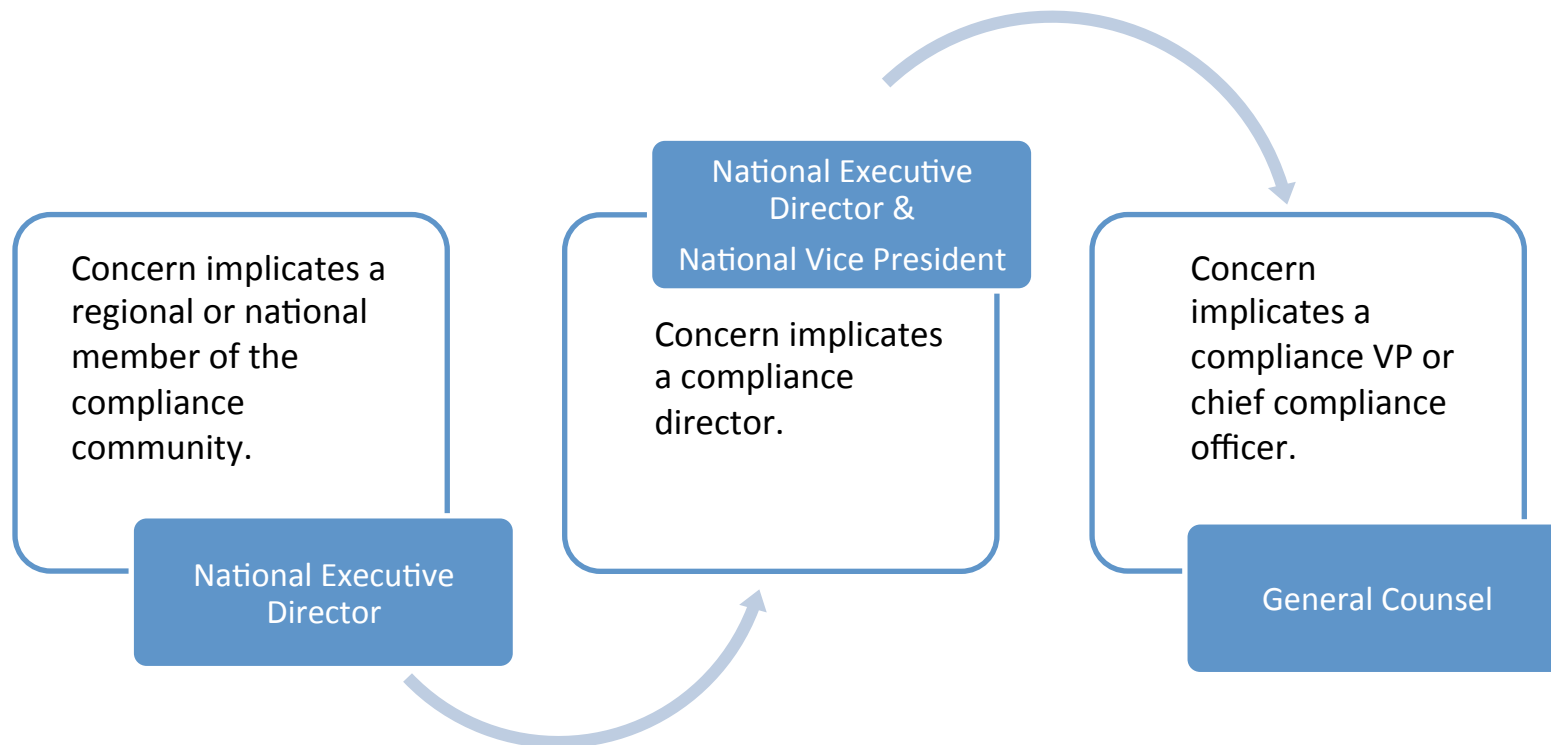
Review
- High volume of low risk HR matters reported through the hotline impacted resources.

HR
- Current script
  - Added a front-end prompt that guides callers to identify what kind of report they are calling about – HR or a compliance matter.
    - Reduced overall call volume by 18 percent.

Policies and Procedures

Concern implicates a regional or national member of the compliance community.

National Executive Director

National Executive Director & National Vice President

Concern implicates a compliance director.

Concern implicates a compliance VP or chief compliance officer.

General Counsel

Getting it Right the First Time

Metrics and Trends

Benchmarking Metrics

Form a broad internal workgroup.

- Regional workgroups/privacy and security/IT/data analytics.

Consider external benchmarks.

- Compliance & Ethics Leadership Council/The Network/NAVEX Global.

Provide context.

- Complete the story.

Proactive Detection

Fraud, Waste, and Abuse Compliance Program
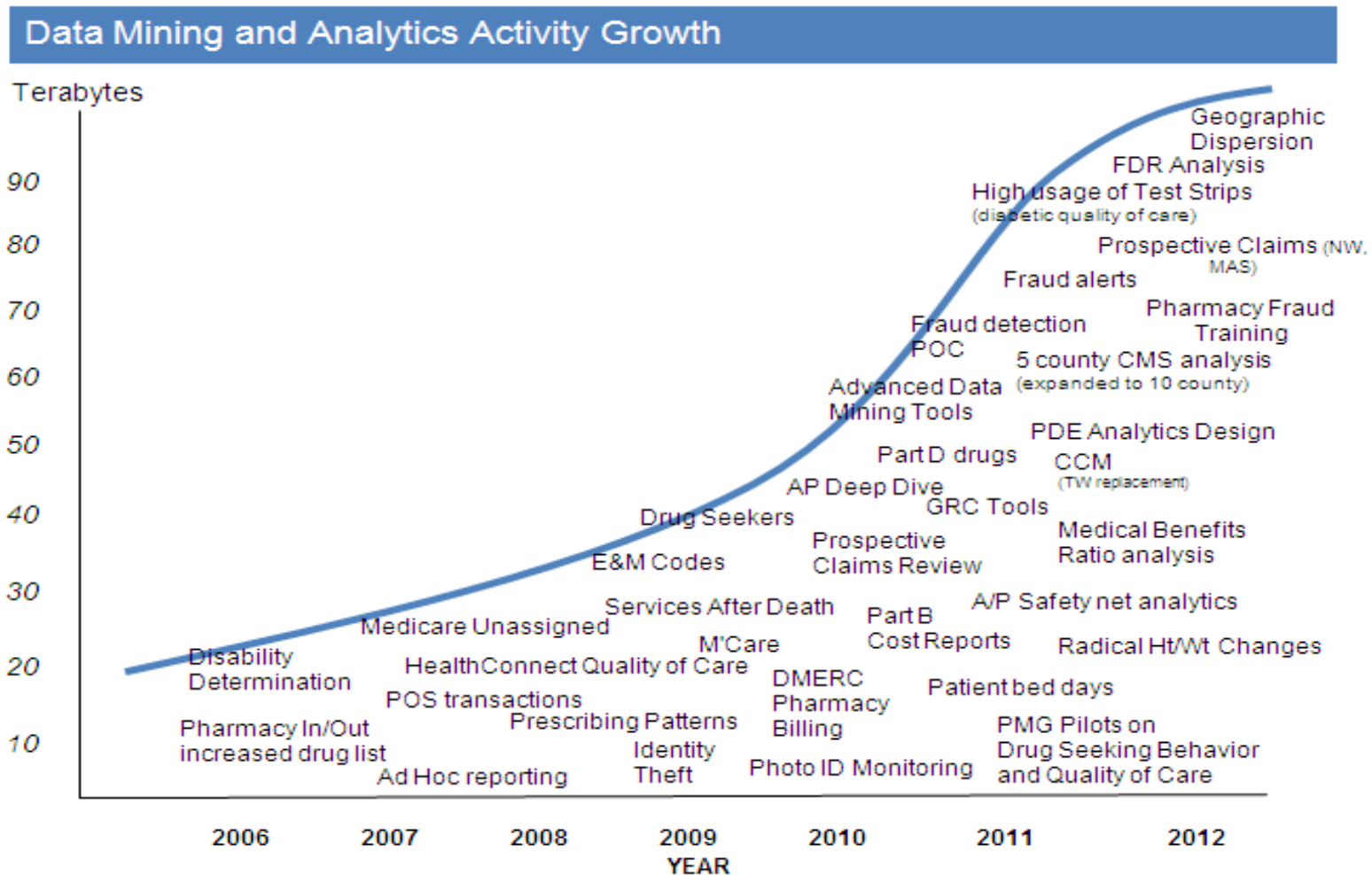
Proactive Monitoring of Trends

Compliance Program Measures - Stoplight Chart

Stoplight Owner =	Target	Region 1	Region 2	Region 3	Region 4	Region 5	Region 6	Region 7	Region 8	Region 9	Region 10	Reporting Period
Audit Reports Completed (All Sources)	80.0%	96.8% ↓	100.0% →	96.1% ↓	100.0%	100.0% →	98.7% ↓	100.0% ↑	100.0% →	90.2% ↓	75.3% ↓	Q2 2014
Case Closure Timeliness	80.0%	93.2% ↓	74.7% ↓	75.9% ↑	93.5% ↓	95.1% ↓	96.2% ↓	86.8% ↑	95.8% ↓	76.2% ↑	85.7% ↓	Jul 2014
Aging Case Closure	95% by 12/31/2014	96.2% ↓	69.4% ↑	94.7% ↓	97.1% ↓	95.0% ↓	99.2% ↓	92.2% ↓	96.8% ↓	54.0% ↓	100.0% ↑	Jul 2014
CAPs Completed by Target Date	80.0%	96.5% ↑	95.1% ↑	92.3% ↓	94.9% ↑	95.4% ↓	98.1% ↑	95.8% ↑	97.0% ↑	86.5% ↑	100.0% →	Jul 2014
Hotline Awareness	95.0%	98.3% ↑	99.1% ↑	97.6% ↓	97.7% ↓	98.0% ↓	98.5% ↑	99.3% ↓	97.4% ↓	99.8% ↑	98.2% ↓	Jul 2014
Annual Compliance Training	95% by 10/31/2014	86.4%	91.9%	54.3%	31.5%	99.9%	94.2%	71.6%	82.5%	100.0%	99.9%	Jul 2014
New Employee Training Timeliness	100.0%	95.5% ↓	100.0% →	90.2% ↓	100.0% →	100.0% →	87.8% ↓	100.0% →	99.0% ↑	100.0% ↑	93.8% ↑	Data extract Aug 1, 2014 / Hire Date Jun 2014

Provide Context

Weight Chart

(Chart: Pounds vs. Months on the Special Formula Diet, showing lines for Karen, Thomas, and Marcus)
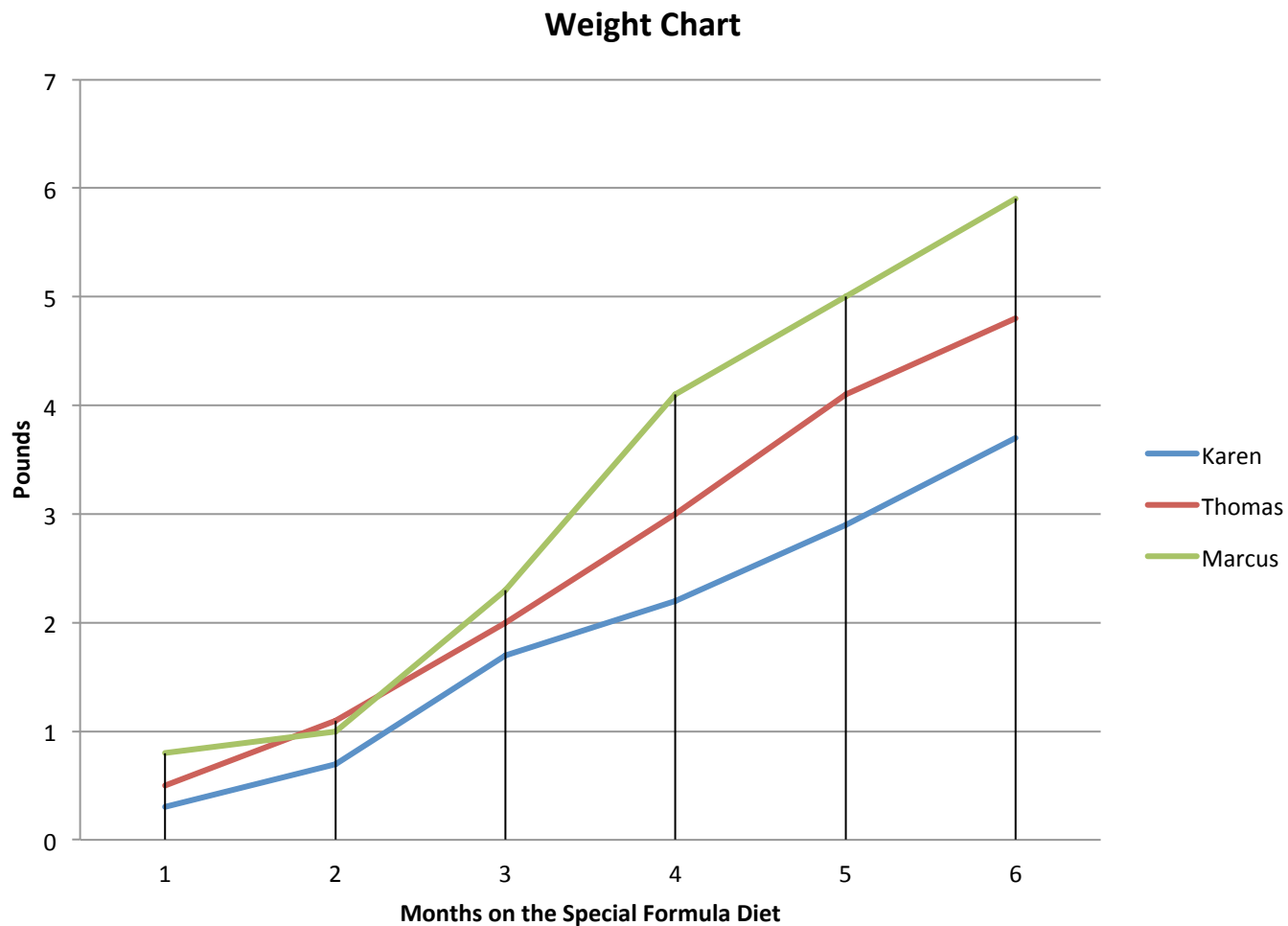
Employee Education and Awareness

Training

Communications

Questions?