

# Corporate Compliance Report

Audit & Compliance Committee of the CCH Board of Directors

October 24, 2022



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# Meeting Objectives

## Review

- CCH Compliance Program Overview
- Metrics
  - System Compliance Program 1<sup>st</sup> through 3<sup>rd</sup> Q County FY 2022
  - CountyCare Compliance Program SFY 2022
    - Recoveries

# CCH Compliance Program



## Compliance Program Overview



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# Structure of the CCH Compliance Program

## Formalized Controls and Activities

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

### PREVENTION CONTROLS AND ACTIVITIES

Written Policies & Standards

Compliance Program Oversight

Education and Training

### DETECTION CONTROLS AND ACTIVITIES

Effective Lines of Communication

Internal Monitoring & Auditing

Enforcement of Standards and  
Disciplinary Guidelines

### CORRECTION CONTROLS AND ACTIVITIES

Response to Offenses and  
Corrective Actions



# CountyCare Compliance Plan

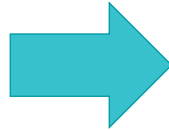
## Policies/Code & Training & Communications

### Written Policies and Standards



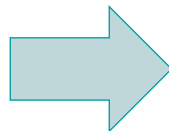
- CCH Code of Ethics
- CCH Compliance & Privacy Policies
- CountyCare specific Compliance & Privacy Policies

### Compliance Program Oversight



- Chief Compliance Officer
- CountyCare Executive Compliance Committee
- Reports to CCH Board / Audit & Compliance Committees
- CCH & CountyCare Annual Reports

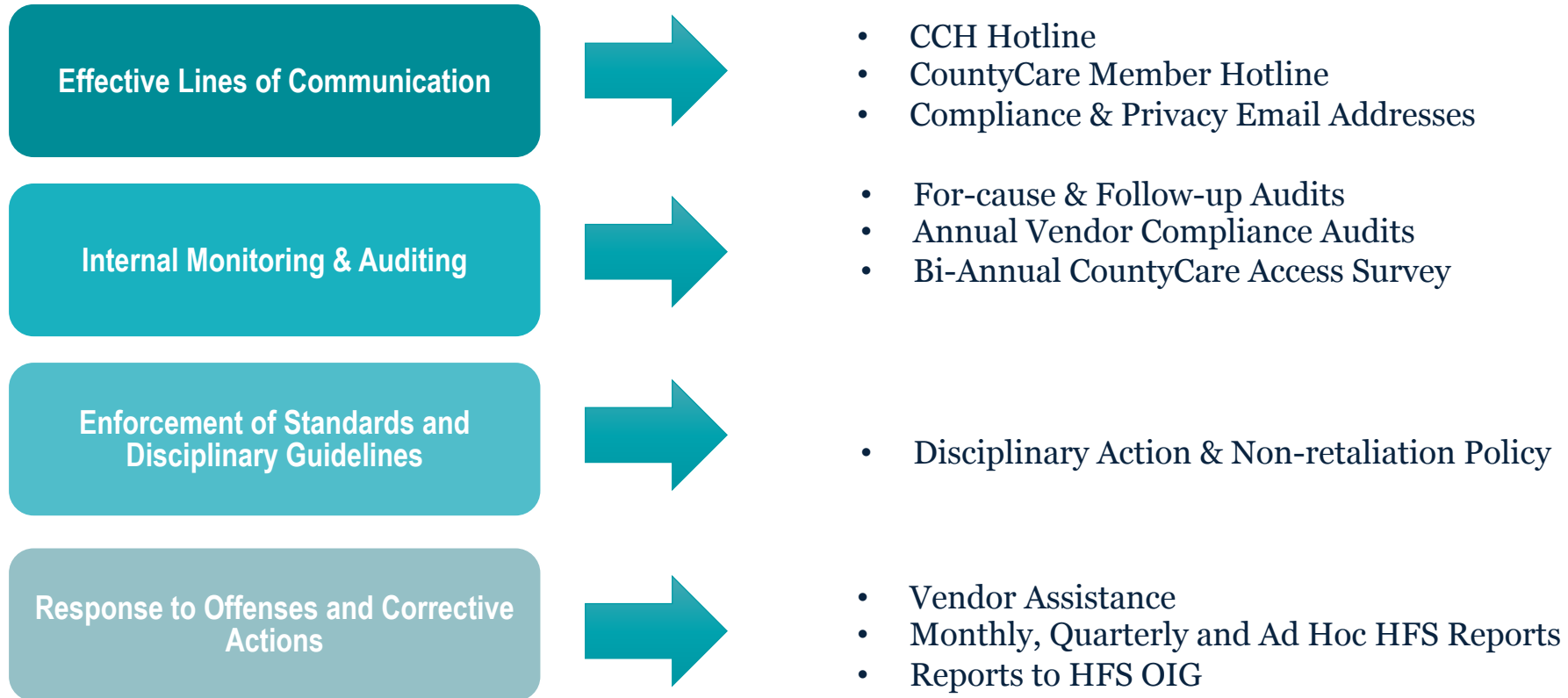
### Education and Training



- New Employee Orientation
- CCH Code of Ethics Training
- CCH HIPAA Training
- CCH FWA Training
- Ad Hoc

# CountyCare Compliance Plan

## Accountability/Auditing/Responsiveness and Reporting



# CCH Provider Metrics



For County Q1 through Q3 2022

(December 1, 2021 to August 31, 2022)

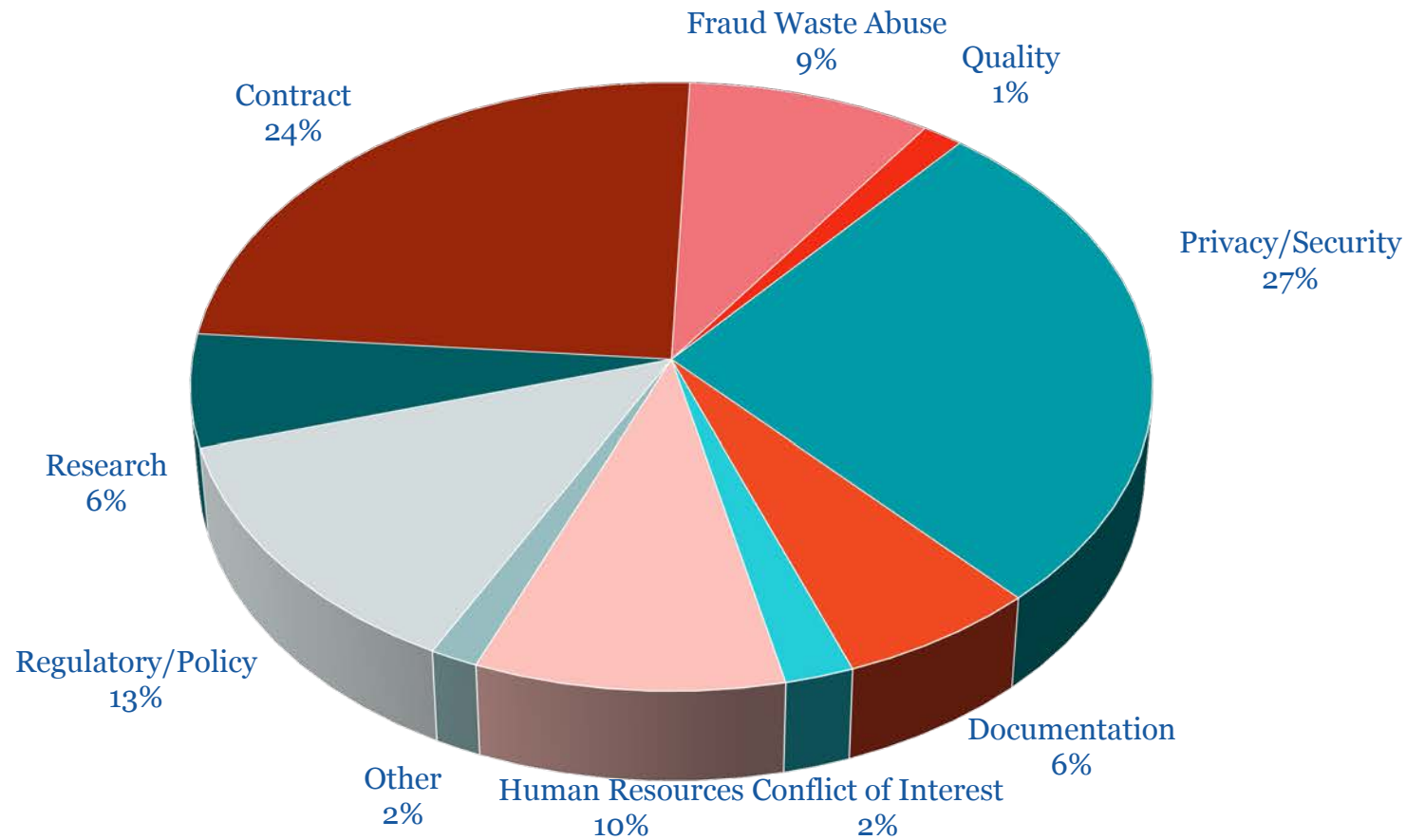


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# FY 2022 Contacts by Category

## CCH System Compliance Program Q1 through Q3

12/01/2021 – 08/31/2022



Categories	2022	2021	
Privacy/Security (HIPAA)	127	32%	↓
Documentation	29	6%	↓
Regulatory/Policy	60	13%	↓
Human Resources	45	10%	
Contracts	114	24%	↑
Conflict of Interest	10	2%	
Fraud Waste & Abuse	42	9%	↑
Research	28	6%	
Quality	7	1%	
Other	7	1%	
	469		



# CountyCare Metrics

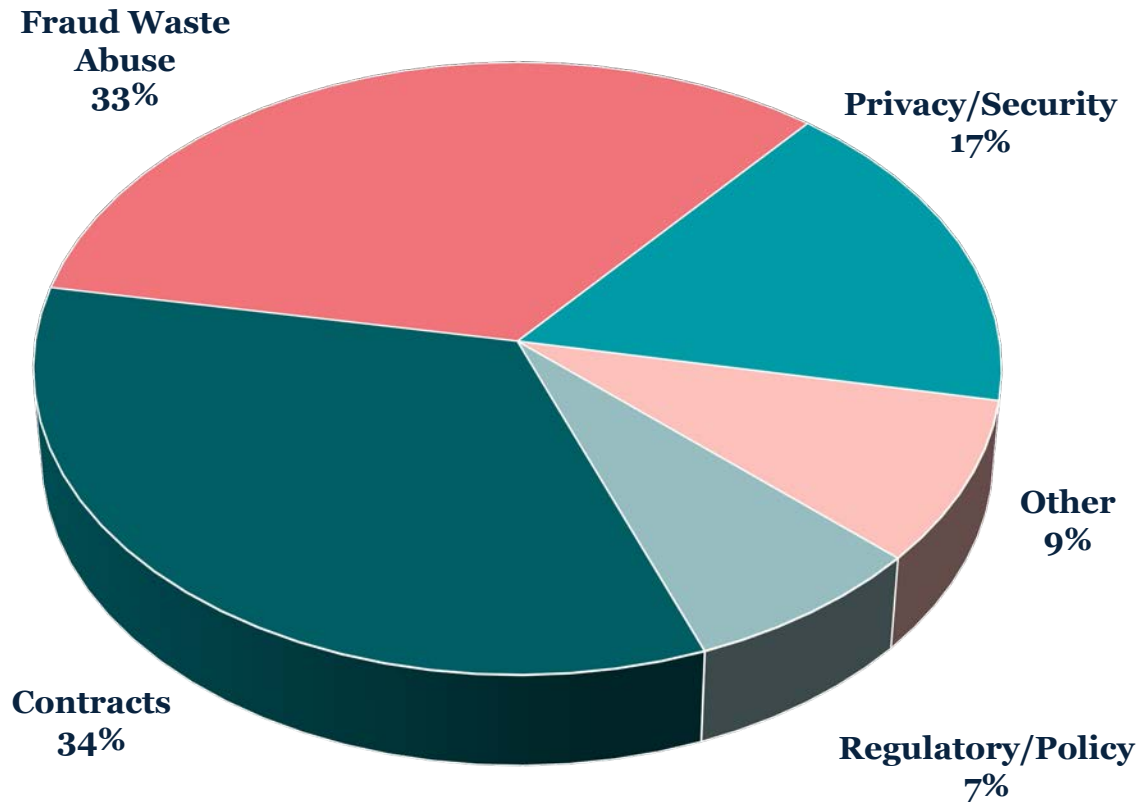
For State FY 2022 (July 1, 2021 to June 30, 2021)



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# CountyCare Compliance Metrics

CountyCare Compliance Program during SFY 2022 (July 1, 2021 – June 30, 2022)



State Fiscal Year 2022\*

Categories		
Fraud Waste & Abuse	235	↑
Privacy/Security (HIPAA)	120	↑
Contracts	238	↑
Regulatory/Policy	53	↑
Other	61	↑
	707	

State Fiscal Year 2021 (Compare)

Categories	
Fraud Waste & Abuse	176
Privacy/Security (HIPAA)	159
Contracts	77
Regulatory/Policy	37
Other	20
	469

\*Increases due to enhanced tracking capabilities & Compliance's review of contracts

# CountyCare Recoveries

## State Fiscal Year 2022 Recoveries

Reporting Period	Overpayments Identified	Overpayments Collected
Q1 07/01 – 09/30/21	\$ 704,372	\$ 66,066
Q2 10/01 – 12/31/21	\$ 1,046,935	\$ 522,453
Q3 01/01 – 03/31/22	\$ 1,276,050	\$ 3,016,460
Q4 04/01 – 06/30/22	\$ 966,366	\$ 3,534,742
<b>Total 2022</b>	<b>\$ 3,993,723</b>	<b>\$6,956,921</b>
<b>Total 2021 + 2022</b>	<b>\$10,317,838</b>	<b>\$8,656,380</b>

## State Fiscal Year 2021 Recoveries

Reporting Period	Overpayments Identified	Overpayments Collected
Q1 07/01 -09/30/20	\$ 1,277,500	\$ 196,600
Q2 10/01 – 12/31/20	\$ 1,697,500	\$ 304,000
Q3 01/01 – 03/31/21	\$ 1,970,360	\$ 713,020
Q4 04/01 – 06/30/21	\$ 1,378,755	\$ 485,839
<b>Total</b>	<b>\$ 6,324,115</b>	<b>\$ 1,699,459</b>

# Questions? ↗



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