TEAM STRUCTURE

- SKYGEN

- UHC

- Baker Tilly

TRANSFORM23

UHC Dental Compliance Program Organizational Structure

Multiple teams work collaboratively to execute Compliance

Audit

Legal

Privacy

Business Areas

Quality Management

Regulatory Affairs

Compliance

Shared Program Components

- ➢ Compliance Education & Awareness
- ➢ Government Interactions Compliance
- ➢ Conflicts of Interest Program
- ➢ Compliance and Ethics Help Center
- ➢ Enterprise Compliance & Ethics Policies
- ➢ Corporate Privacy Office

Audit
Various audit teams focused on evaluating, testing and validating business performance, exam management; Fraud program administration, audits, etc.

Privacy
Focused activities related to use, disclosure, administration and procedures for handling PHI. Incident investigation management, including remediation activities.

Quality Management
Focuses on the analysis and improvement of business processes towards continuous improvement in quality
.

Compliance
Core compliance activities as part of required formal program, including policies, responding to problems, training, oversight, investigating reports of non-compliance, etc.

Legal
Focused activities supporting regulatory interpretation, response to regulator inquiry, investigations, legal issues and actions, etc.

Regulatory Affairs
Monitoring and disseminating regulatory change information, prompting implementation actions and providing related interpretations

Business Areas
Focus on ensuring day to day operational activities follow various local, state, and federal rules / regulations as well as with individual client requirements

SKYGEN COMPLIANCE PROTOCOLS/AWARENESS

- SKYGEN Process for Identifying and Reviewing New Laws/Regulations or Changes to Existing Laws/Regulations

  - Monthly Review of State/Federal Websites

  - Weekly Review of NADP Legislative Online Tracking System or LOTS (monitoring system that tracks critical and applicable legislation and regulation in all 50 states)

  - NADP Working Groups (Government Funded Programs WG; Government Relations WG)

  - Communication with Compliance Groups

  - Partnering with Clients

- SKYGEN Process Upon Awareness Of New Law/Regulation Impacting SKYGEN and/or Our Clients

TRANSFORM22

UHC DENTAL COMPLIANCE PROTOCOLS/AWARENESS

- **General Compliance Awareness and Communication Process**
  - Corporate and business unit compliance leads monitor multiple external sources for regulatory change impact
  - Updates are posted to central **Compliance Hub** SharePoint
  - Each layer (Compliance Champion) in the compliance team hierarchy receives push notifications from **Compliance Hub**
  - Each Compliance Champion documents impact and adherence plan within the **Compliance Hub** (additional technical tools and monitoring requirements are employed dependent on the regulatory requirement)
  - Program owners implement process, systems, workflow, training programs, and documentation updates to internal and delegated entities

- **General Compliance Program Components**
  - Code of Conduct Policy Awareness
  - Fraud, Waste and Abuse (FWA) & General Compliance Training (Required for new hires and annually)*
  - Office of Inspector General (OIG), GSA System for Award Management (SAM) and/or State exclusion lists
  - Documentation Creation and Retention Policies
  - Delegation of Authority
  - Monitoring and/or auditing subcontracted delegates
  - Multiple technology tools leveraged for monitoring, policy maintenance, and communication
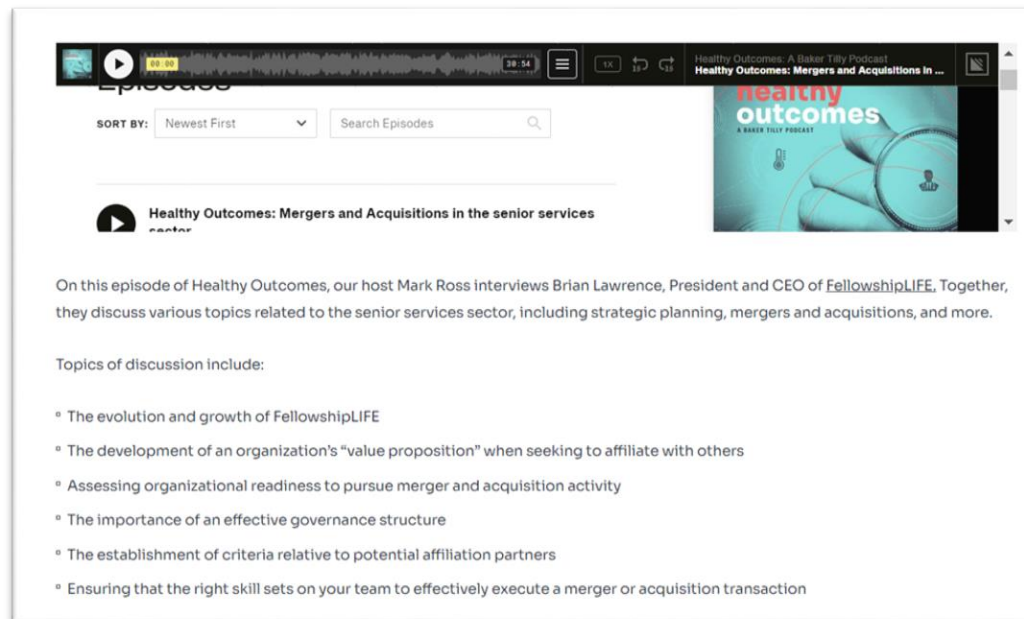
*For Medicaid programs, the Deficit Reduction Act of 2005 requires written policies and procedures to support FWA prevention efforts for employees and subcontractors, including requiring delegates to distribute such policies and procedures to their employees and subcontractors.

BAKER TILLY COMPLIANCE PROTOCOLS/AWARENESS

- Education
  - Roundtables
  - Webinars
  - Thought Leadership
  - Healthcare monthly newsletter
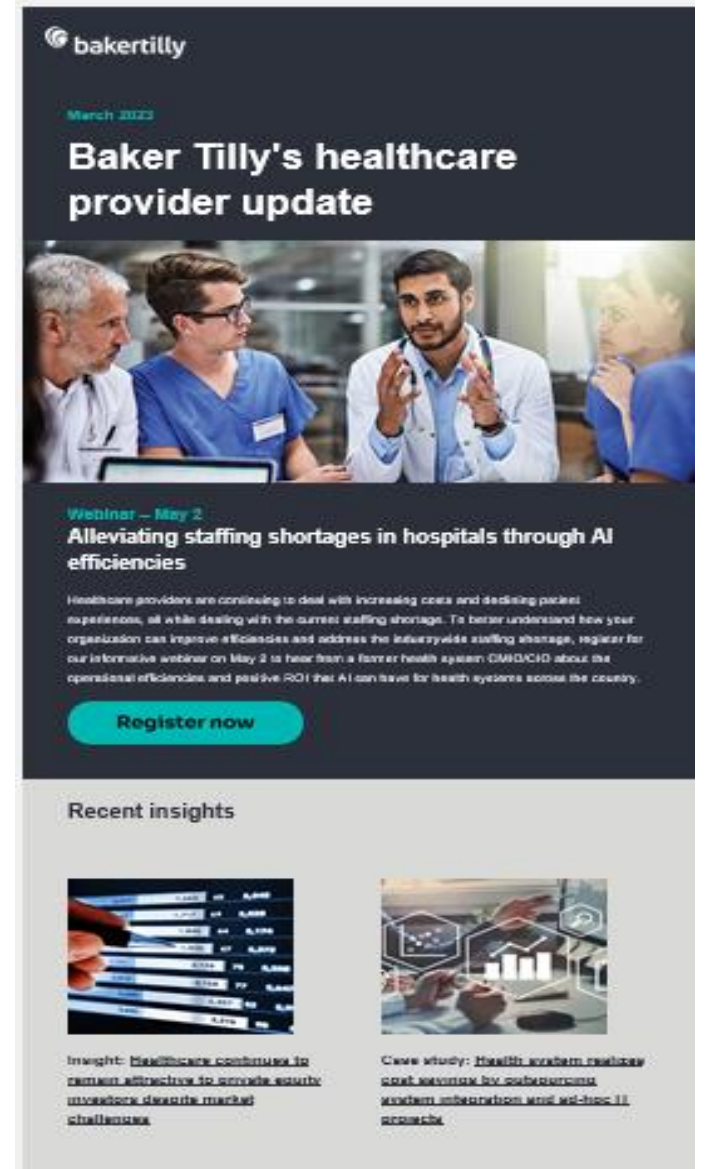 - Healthy Outcomes Podcasts

COMPLIANCE PROTOCOLS/AWARENESS

- **Audience Question** - What is you process of identifying and communicating new regulations internally?

BAKER TILLY GUIDANCE ON CYBERSECURITY/DATA SECURITY & COMPLIANCE

Reporting and communicating
Externally and internally communicates information, including objectives and responsibilities.

Governance and Oversight
Deliver strategic advisory in the areas of board governance, risk oversight and management, board engagement and recruitment, compliance, financial and strategic analysis.

Regulatory interaction and coordination
Assist in complying with Federal, state, agency, industry and other regulations, including identifying and implementing improvements to policies, procedures and controls.

Policies, Procedures and related controls
Implementation of controls, including: risk assessment and management, policies, procedures, processes, IT assets and infrastructure. Focus on control framework structure that aligns with your industry (e.g., HITRUST, CMMC, System and Organization Controls (SOC))

Compliance Monitoring and auditing
Conduct compliance reviews based on compliance calendar and events. Identify issues to monitor and report and ensure proper documentation necessary.

Effective Compliance risk management Program

Compliance charter
Roles, strategy, responsibilities, status, and authority of the Compliance Function including annual work plan and calendar.

Compliance Training and Education
Tailored training for employees in relevant control functions, including training for employees in high-risk areas.

Risk Assessment
Identification and management of cross-enterprise risks, alignment of risk appetite and strategy, risk response improvement, loss minimization, opportunity management and deployment of capital optimization.

HOT TOPICS

- **Telehealth Services:**
  - Regulations and implications regarding remote consultations and teledentistry

- **Data Security and Privacy:**
  - Compliance with HIPAA and data privacy and security regulations; HITRUST

- **Billing and Coding Changes:**
  - Updates in dental procedure codes; Coding and claims edit

- **Fraud Prevention:**
  - Measures to prevent and detect fraud, waste, and abuse

CMS READINESS AUDIT PREPAREDNESS

- SKYGEN Guidance

- UHC Guidance

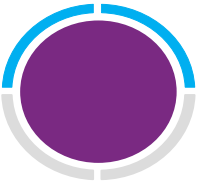- Baker Tilly Guidance

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UHC DENTAL CMS AUDIT FRAMEWORK

Circular framework diagram with "CMS Audit Command Center" at the center, surrounded by five stages in a cycle:
- Contract/Process Requirements
- Discovery Documentation
- Audit Execution
- Results & Findings
- Remediation and Lessons Learned

CMS READINESS AUDIT PREPAREDNESS

- Baker Tilly Guidance

- Implement a Compliance program and enhance value
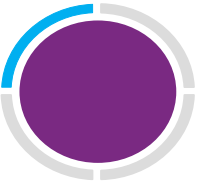
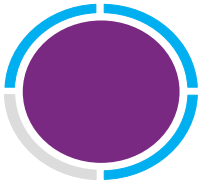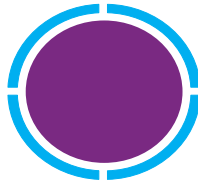| Plan	Discover	Assess	Report
Identify control owners/stakeholders and determine project governance and support.	Interview key stakeholders to identify risks within the environment. Obtain design and implementation supporting control evidence.	Synthesize information listed and prioritized risk statements with rationale.	Draft and validate controls, including opportunities to address the identified observations, challenges, and opportunities for improvement.

Q & A

Thank You

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