Back from the Brink: Transforming a Psychiatric Rehabilitation Program on the Heels of a Self-Report

Dr. Kristine Koontz, SSGB, Ph.D., Vice President of Quality and Clinical Services
Lindsay Lebo, CHC, Director of Compliance
Victoria Hoshower, BA, Assistant Director of Quality
Keystone Human Services

- This presentation is not representative of legal advice or opinion, if you should encounter a similar situation as outlined in this presentation, you’re advised to reach out to your legal counsel for consult in the self-reporting process.
Presentation Overview

- The psychology of self-reporting: how to navigate your autonomic nervous system’s flight, “fight” or freeze responses. It takes a village—and a detailed work plan:

- Using an integrated Compliance-Quality Management framework to systematically develop and implement an improvement work plan and meet performance requirements in the context of limited organizational resources.

- Sustaining the Improvements: Proven QPM methods for securing the improvements, continued attention to workforce transformation and the critical nature of communication and collaboration with external administrative entities.

Uncovering the Issues

- Priority Programs from the Organization Risk Assessment
- Licensure by regulatory oversight entity
- Re-credentialing by MCO
- Internal Self-Audit
Internal Self-Audit

- The internal audit was conducted prior to the annual licensing visit with the intent of:
  - Fulfilling assessment of those programs identified as being ‘high risk’ as indicated on the organization risk assessment
  - To assess programmatic due-diligence in preparation for an external audit

Internal Self-Audit continued

- Probe
- Larger Sample Size
  - Decision points included looking at the sample assessed to determine if reimbursement to the funder is needed based upon an identified overpayment versus;
  - Looking at the sample assessed to determine pervasiveness of non-compliances that are directly related to reimbursement
Initiation of the Self-Report Process

- Self-reporting process commenced with the funding sources after findings of the internal audit were found to be in alignment with the self-reporting criterion for providers
  - It is recommended that legal counsel be consulted at the onset of the self-reporting process
  - Understanding risk of self-report - there is an obligation to act as a compliance professional when such findings are of note;
  - In good faith reporting as part of organizational due-diligence and transparency there is often lesser penalties

Organizational Benefits

- Global assessment of program and other like programs in order to assess/address-
  - Cultural issues in addition to regulatory indicators for an overall programmatic assessment
Challenges

- Organizational Culture
  - Fight
  - Flight
  - Freeze
- Uncharted Waters
- Limited Resources

Integrated Framework

- Compliance and Quality
  - Detailed Improvement Plan and Associated Work plan
- Communication
  - External
  - Internal
    - Weekly Check-ins
    - Regular Reporting
- Workforce development and Transformation
Sample Work Plan

<table>
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<th>Major Action Step</th>
<th>Find and Correct</th>
<th>Date Due</th>
<th>Date Completed</th>
<th>Form Revision</th>
<th>Date Due</th>
<th>Date Completed</th>
<th>System Revision</th>
<th>Date Due</th>
<th>Date Completed</th>
<th>Lead Staff Responsible</th>
<th>Start Date</th>
<th>Planned End Date</th>
<th>Evidence of Completion</th>
</tr>
</thead>
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Presentation Recap

- Doing your organizational due diligence prior to someone else doing it for you
- Transparency with external entities in a good faith effort leads to lesser penalty
- Changing culture takes time and persistence
- Corrective actions need to be actively managed for the long term
QUESTIONS?

CONTACT INFORMATION

- Dr. Kristine Koontz, SSGB, PhD., Vice President of Quality and Clinical Services
  - kkoontz@keystonehumanservices.org

- Lindsay Lebo, CHC, Director of Compliance
  - llebo@keystonehumanservices.org

- Victoria Hoshower, BA, Assistant Director of Quality
  - vhoshowe@keystonehumanservices.org