

# Exclusion Monitoring at UC Davis Health

## SUBMITTED BY:

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## Summary

UC Davis Health bills federally funded healthcare programs, including Medicare and Medi-Cal for patient goods and services. The Office of Inspector General for the Department of Health and Human Services (“OIG”) is the federal oversight body charged with the enforcement of payment violations involving fraud, waste, and abuse. The OIG directed that federal healthcare program payments may not be made for any items or services furnished, directly or indirectly, by an excluded individual or entity.<sup>1</sup> In order to ensure compliance with federal and private payment provisions, UC Davis Health needed to have a program in place to ensure that those individuals and entities prior to onboarding and monthly thereafter. The practices had fragmented this function throughout the organization and UC Davis Health was at a risk of incurring fines as high as \$10,000 per item claimed or service provided by an excluded individual or entity. Therefore, the project team selected and partnered with a vendor Streamline Verify and deployed Streamline Verify application for a unified process.

## Project Team

Project Position	Name	Department
Executive Sponsor	Shara Rasmussen	Compliance Department
IT Sponsor	Angelica O Lewis	IT Enterprise Applications
Compliance Manager	C. Brandi Hannagan	Compliance Department
Business Process Owners	Shana N Mcclendon, Marissa Razo	Compliance Department
Data Analyst	Avan Lo	Compliance Department
IT Project Manager	Christy L Poole	IT Enterprise Applications
IT Business Analyst	Deepima Pathania	IT Enterprise Applications

## Narrative

Before the implementation of **Streamline Verify**, each department went to the OIG and SAM’s websites separately and screened a single individual or entity which took a lot of time. The project team selected Streamline Verify application after thoroughly researching and analyzing its capabilities to meet our business requirements, and its compatibility with UC Davis Health systems.

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<sup>1</sup> Office of Inspector General, *Special Advisory Bulletin Outlines Effects of Exclusion from Federal Health Care Programs*. Sept 29, 1999.

The data extracts were developed for the following population after research and collaboration with multiple teams to be sent to Streamline Verify for monthly screening.

1. UC Davis Health Employees
2. School of Medicine/ School of Nursing Students
3. Vendors providing services and goods to UC Davis Health
4. UC Davis Health Volunteers

These extracts are fed into their lists respectively in the system. Once the data extracts are run against exclusion databases, the potential matches are displayed. Streamline Verify employees then resolve potential matches by using DoB and SSN. The reports are updated real time as the matches are resolved.

## Issues

After the analysis and weekly discussions with the Compliance team, a unified process was designed. However, the following issues and challenges were faced by the project team:

1. The technical resources were limited due to the overlapping timelines between UCPATH implementation.
2. The DoB was not available for all the individuals in the system and it was a required field to resolve a potential match.
3. There was no filter in the Quali Financial System (KFS) to separate vendors who provide goods and services to UC Davis Health vs UC Davis Campus. Since Streamline Verify charges UC Davis Health per record, sending all the vendor data would have increased the cost.
4. The vendors get onboarded in two different systems, therefore, defining a point in the vendor onboarding workflow and selecting the appropriate team to do initial screening to minimize risks required executive committee's decision.

## Solution

Streamline Verify provides full service which includes:

1. Monthly Screening of the population as mentioned in the Narrative above on our behalf
  - Extracts from UCPATH, Samaritan, Student Information System (SIS), and Quali Financial System (KFS) are sent to Streamline Verify monthly.
  - Streamline Verify provides Compliance Department with month-end reports reflecting screening results. The screening history of each individual is retained and is tied to the unique ID.
2. Access to the Streamline Verify application for initial screening of vendors as part of the onboarding process. This feature is used by Health Systems Contracts department and UC Davis Health Finance Department (Vendor Management team).
3. Since there were limited resources due to UCPATH implementation, the Employee extract was pulled from PeopleSoft's older version in August 2019 which was then replaced by UCPATH two

months later. The solution system had the capability to switch old employee IDs to new employee IDs thereby retaining the screening history of each employee.

4. A future state process was designed to accommodate missing DoB in the system for potential matches.
5. After a lot of research and debate, an innovative data selection criterion was established to filter vendors who provide services and goods to UC Davis Health only and overcame the existing system's limitations. The vendor extract was successfully tested and implemented.
6. With the executive committee's assistance, a decision was made to give access to UC Davis Health Finance team to Streamline Verify for screening vendors as part of their onboarding process, thereby improving the efficiency.

### Key Performance Indicators

1. **Increased Efficiency:** Streamline Verify application provides an instant turnaround time against all Federal and State exclusion databases, thereby reducing the time taken to screen a vendor significantly. Customers have reported that they like the application and it has saved them time significantly.
2. **Reduced Risk:** Adhering to federal guidelines has reduced the risk of incurring heavy penalties has reduced significantly.
3. **Increased Visibility and Better Management:** The Data Owner from Compliance Department mentioned liking a single application for initial and monthly screening. The real-time reports provide an increased visibility over the administrative process.
4. **Pilot for other UC's with Health Systems:** Being the first UC Health System to meet Exclusion Monitoring requirements successfully indicates this as one of the performance measures. The implementation has led other UC's to consider selecting Streamline Verify as their partner vendor. Also, they have reached out to UC Davis Health project team to consult on implementing the project.
5. **Other Departments considering using the application:** Med Staff periodically screens doctors with emergency privileges and other staff members. They mentioned that they might be interested in using Streamline Verify.

### Collaborations with Other Locations, Departments and Teams

The project team collaborated with the following teams for analysis and design of the data extracts:

1. UCPATH team for the employee and TES data
2. UC Davis Campus - Quali Financial System team for the vendor data
3. Samaritan for the volunteer data
4. Student Information Systems for student data
5. UC Davis Health Finance, Health Systems Contracts teams for providing them access to the application for initial screening of vendors as part of their onboarding process.
6. UC Riverside, UC San Diego to collaborate and advise on overcoming expected challenges

## Timeframe of Deployment

- The project was deployed in phases and took 1 year 8 months to roll out data extracts from 5 systems. The extracts continue to be sent monthly to Streamline Verify via secured transmission mechanisms.
- Weekly meetings were held with the customer (Compliance Department) throughout the timeline.

