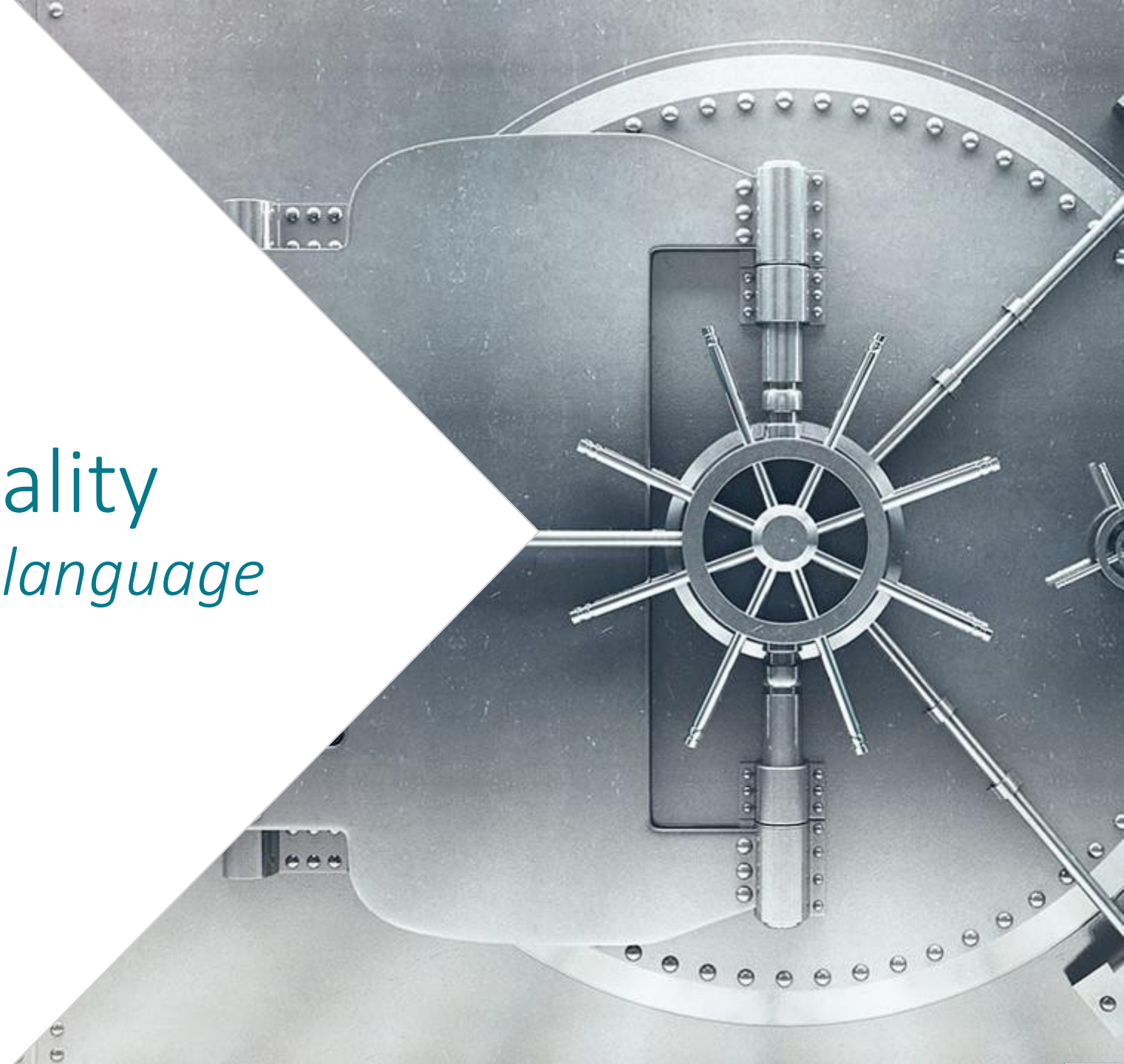
Compliance & Quality

It's time to learn a new language

Elizabeth A. Delahoussaye, RHIA, CHPS
Ciox Chief Privacy Officer

August 26, 2021



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Elizabeth A. Delahoussaye, RHIA, CHPS

Corporate Compliance and Chief Privacy Officer

- Served on the AHIMA Board of Directors and was the Speaker of the House of Delegates in 2016
- Served as a representative for THIMA on the AHIMA House of Delegates
- President-Elect and President for THIMA from 2008 thru 2010
- Co-chair on the AHIMA ROI Tool Kit in 2013
- AHIMA Annual Program Committee in 2014 and 2015
- AHIMA's Privacy and Security Council from 2017 to 2019
- In 2013 she received the THIMA Distinguished Member Award for serving and volunteering over the years on both the state and national level

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Polling Question

How do you rate your knowledge of Six Sigma?

A. No knowledge or limited knowledge
B. Familiar with Six Sigma
C. Experience using Six Sigma
D. Well versed in Six Sigma

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Agenda

Key Terms in this New Language

Translating Processes into Improvements

Compliance Program Layout

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What languages do you speak?

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Welcome to a whole new language …

- Pareto
- DPMO
- 5 Whys
- Root Cause Analysis
- Poka Yoke

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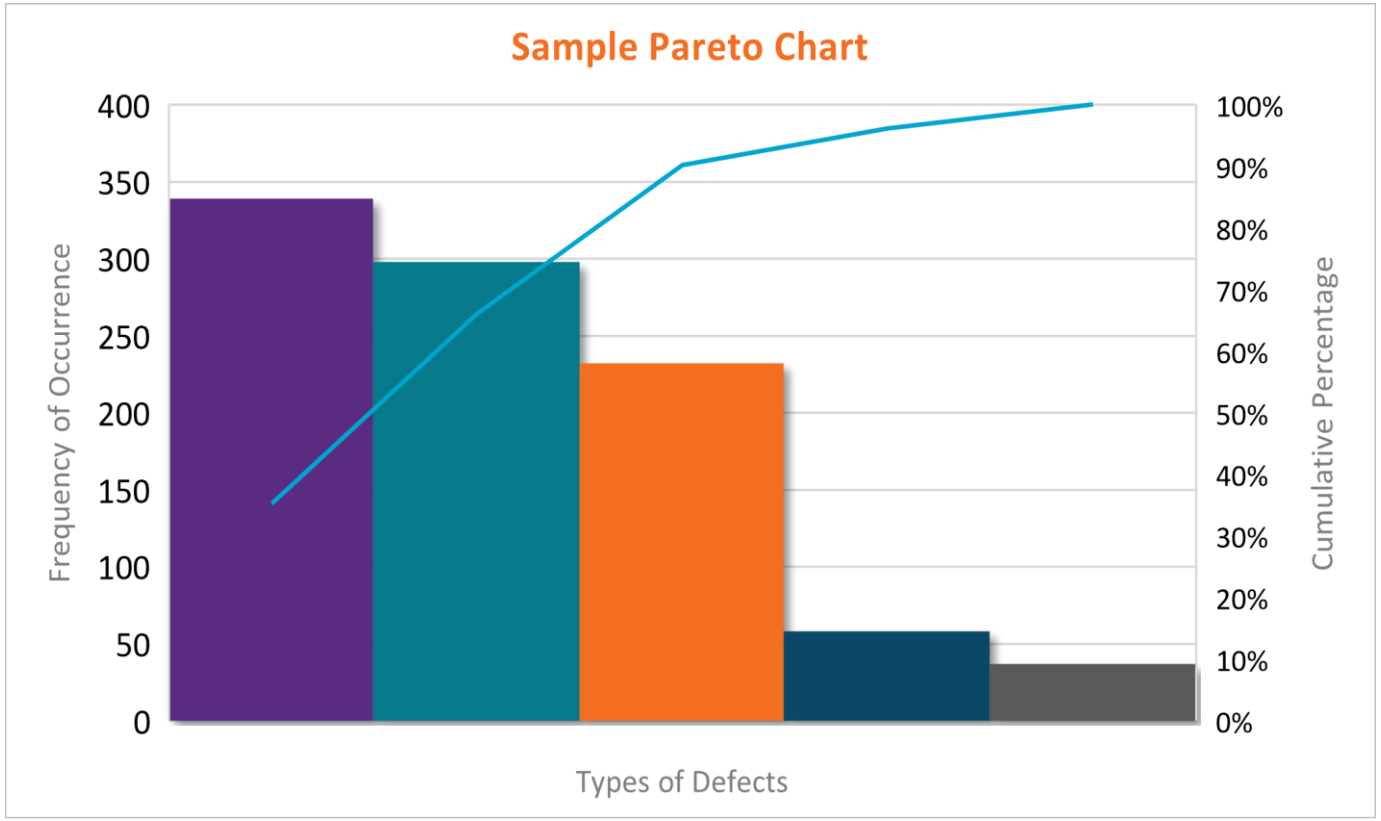

Pareto Principle

aka the 80/20 Rule

Specifies that 80% of consequences come from 20% of the causes, serving as a reminder that the relationship between inputs and outputs is not balanced

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Formula

$$\frac{\text{Total number of defects found in a sample}}{\text{Sample size x Number of defect opportunities per unit in the sample}}$$

x

1,000,000

=

DPMO

DPMO

Defects Per Million Opportunities

Defects are defined as a non-conformance of a quality characteristic to its specification.

3.4

Highly capable processes – processes of Six Sigma quality – are those with fewer than 3.4 DPMO

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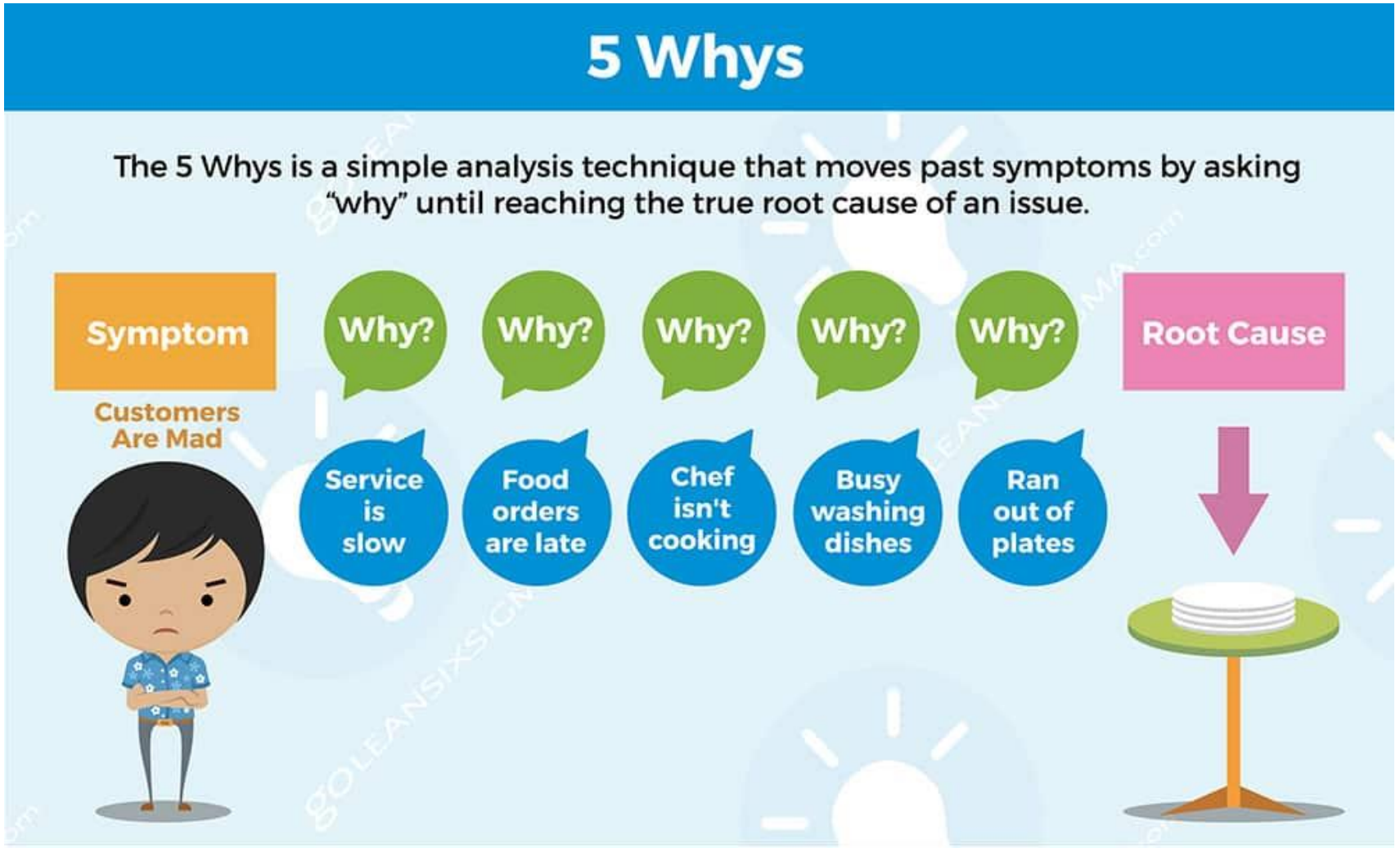
5 Whys and Root Cause Analysis



Source: https://goleansixsigma.com/5-whys/

Root Cause Analysis

Collection of tools and processes used to determine the most important causes for the issue we are trying to resolve

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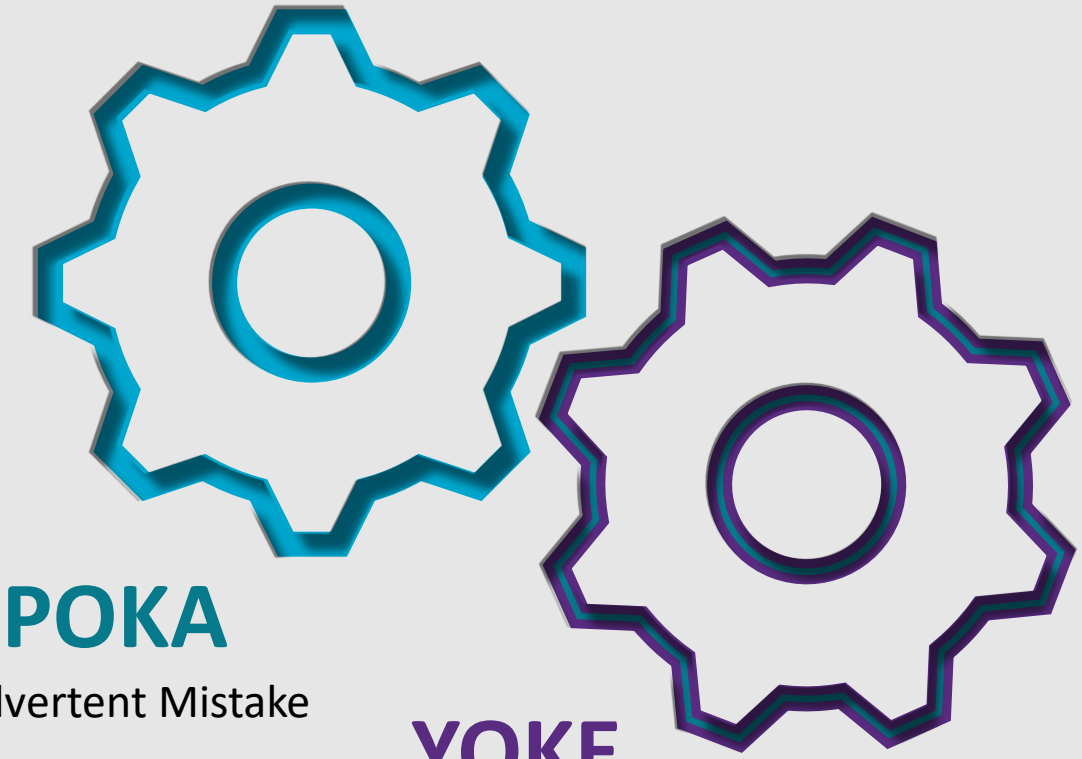
Poka Yoke *(poh-kah-yoh-keh)*



POKA

Inadvertent Mistake

YOKE

Prevention

Poka Yoke

Used to design processes so that defects are almost impossible

≠ finding or correcting mistakes in a process

= preventing them from ever being made

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Translating the Process into Improvements

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The Process

Problem Statement	Describe the defect
Pareto and DPMO	Determine where the defect is caused
5 Whys	Analyze the process in which the defect is found
Root Cause Analysis	Identify the underlying reason for the defect
Poka Yoke	Devise a solution and make sure the defect cannot be made again

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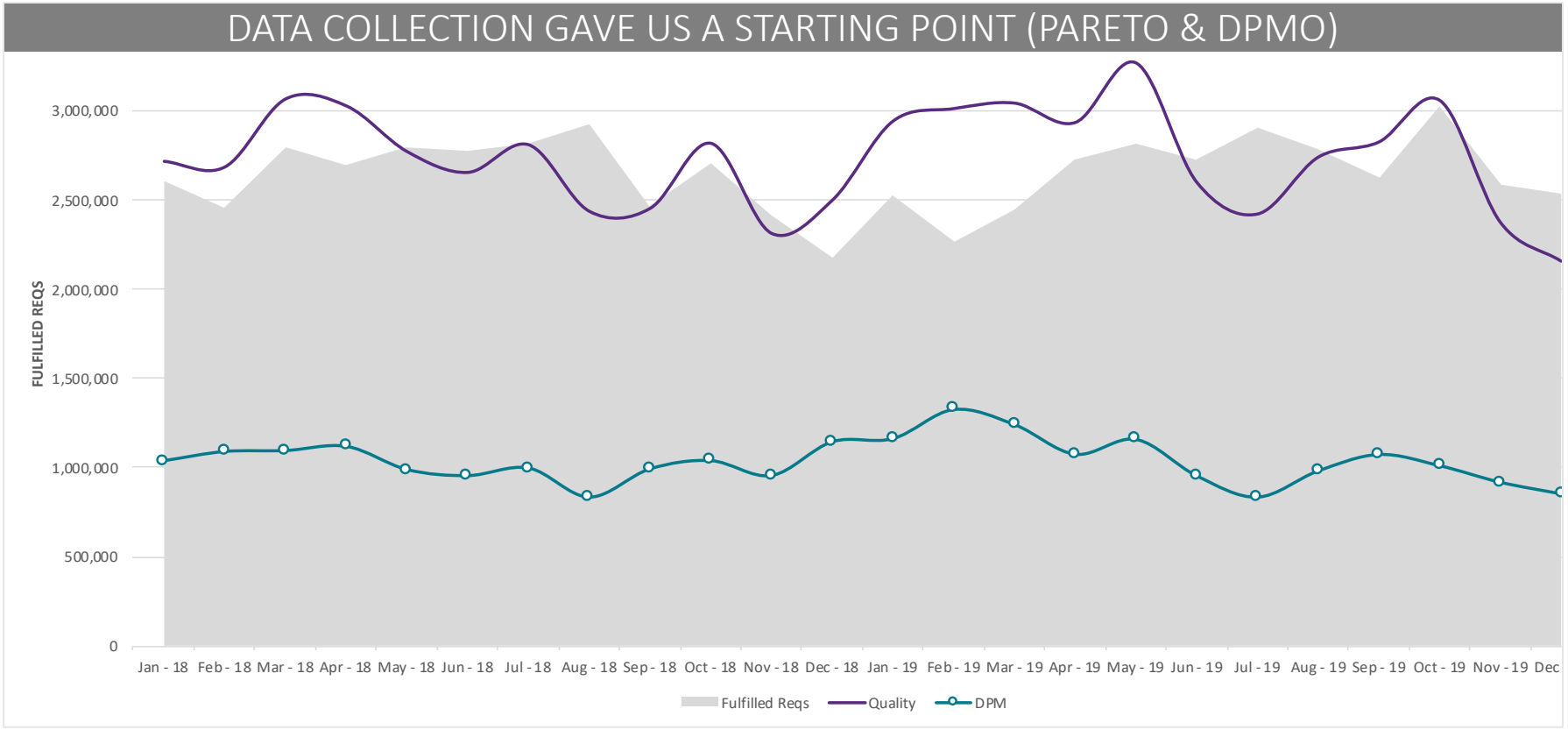
Where we started – quality in 2018-2019



Problem Statement:

Quality causes customer abrasion and attrition and quality incidents per million requests are historically high

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Isolating Issues and Making Significant Improvements

- Focus on productivity
- HealthSource rollout
- Limited focus on DPM improvement

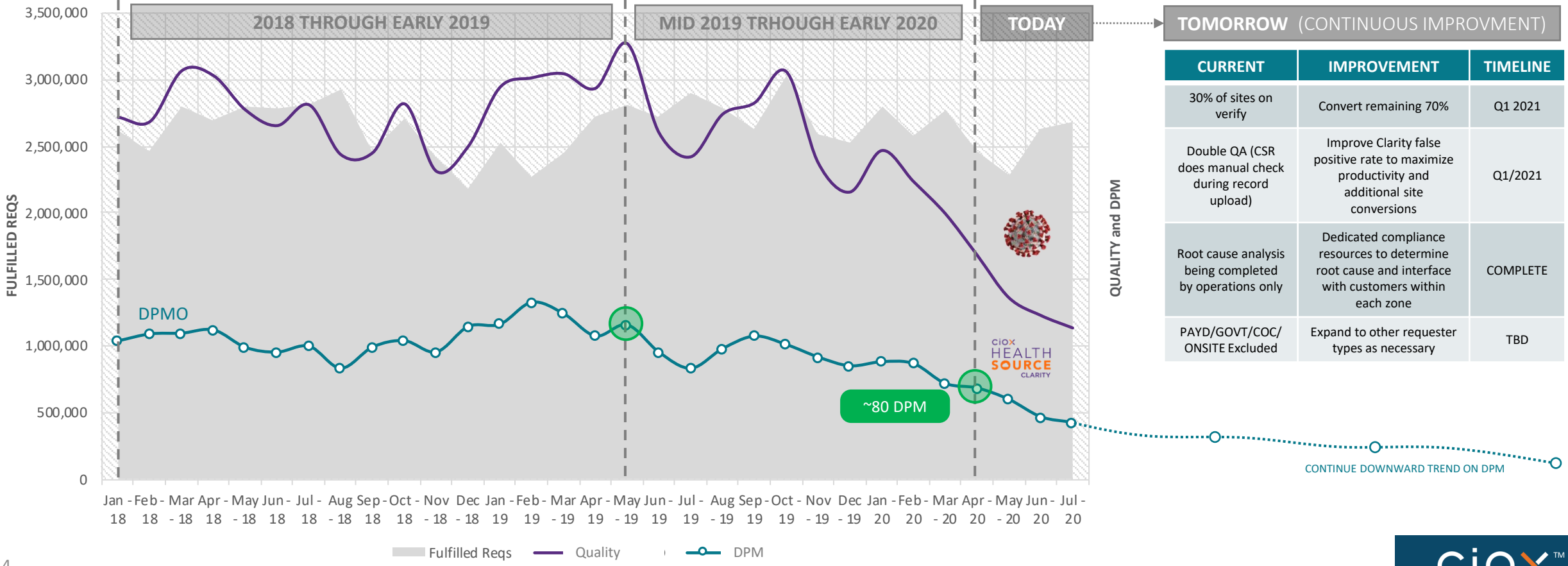
DATA COLLECTION GAVE US STARTING POINT (PARETO & DPMO)

- Daily visibility/focus at site level
- Weekly deep dive reviews
- Showcase project
- Root cause analysis (5 Whys)
- Site level process improvements

DRIVING **PROCESS** IMPROVEMENTS

- Health Source + AI-enabled compliance checks
- Improving compliance technology throughput and accuracy

DRIVING **TECHNOLOGY** IMPROVEMENTS



CURRENT	IMPROVEMENT	TIMELINE
30% of sites on verify	Convert remaining 70%	Q1 2021
Double QA (CSR does manual check during record upload)	Improve Clarity false positive rate to maximize productivity and additional site conversions	Q1/2021
Root cause analysis being completed by operations only	Dedicated compliance resources to determine root cause and interface with customers within each zone	COMPLETE
PAYD/GOVT/COC/ ONSITE Excluded	Expand to other requester types as necessary	TBD

3-tiered Action Plan

TOP DOWN

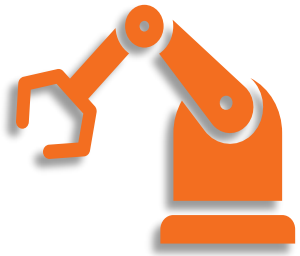
- Executive Team Focus
- CEO Town Hall
- Daily awareness of quality
- Think About It Thursday
- Coffee with Compliance
- Privacy/Compliance Website

- Reorganization of Compliance/Privacy Department
- Training on 5 Whys and Root Cause Analysis
- One-on-one conversations with our field staff

BOTTOM UP

TECHNOLOGY

- Optical Character Recognition
- Process improvement based on the Technology



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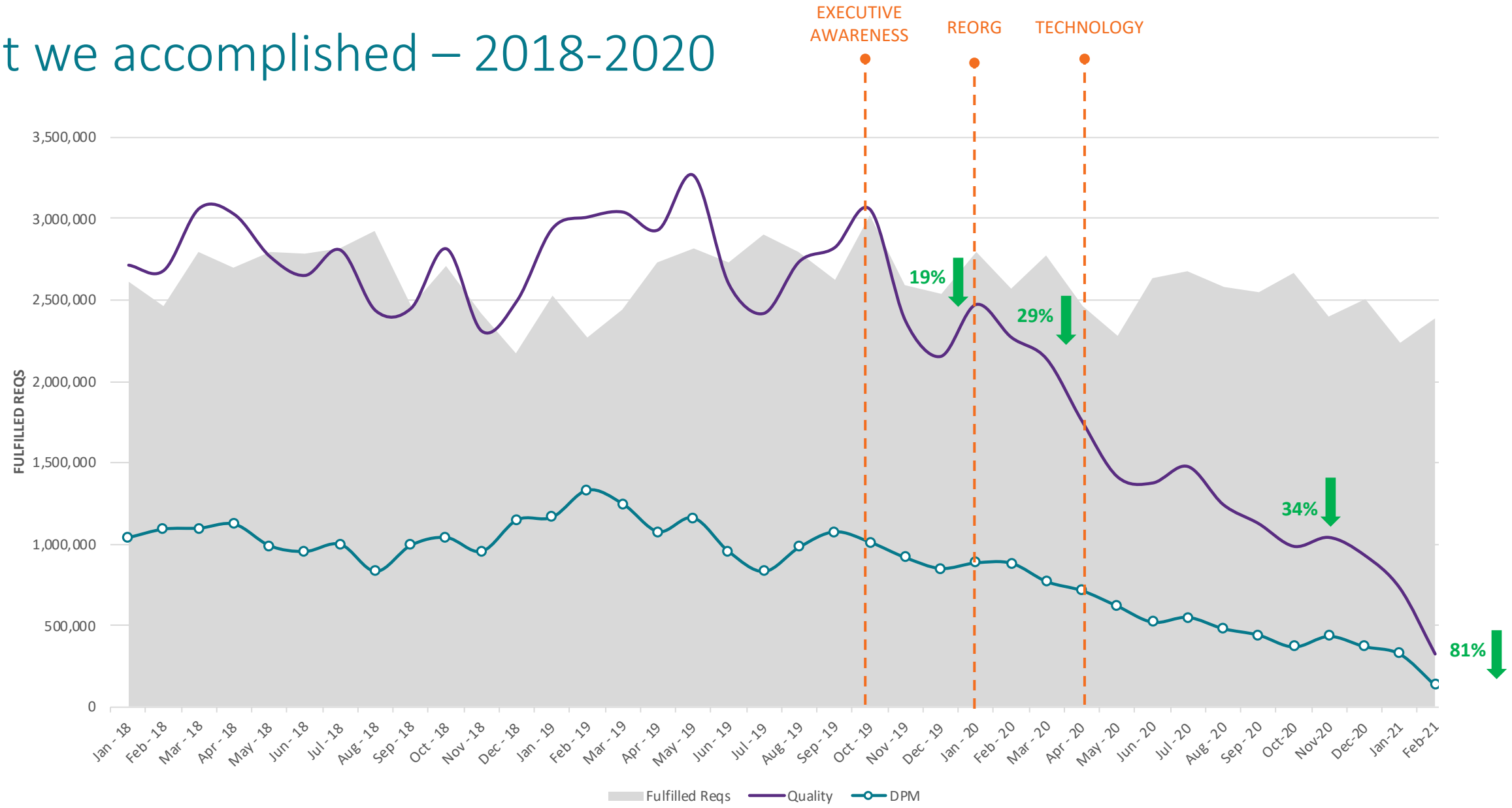
What we accomplished – 2018-2020



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The Result

Our Industry-leading Compliance Program

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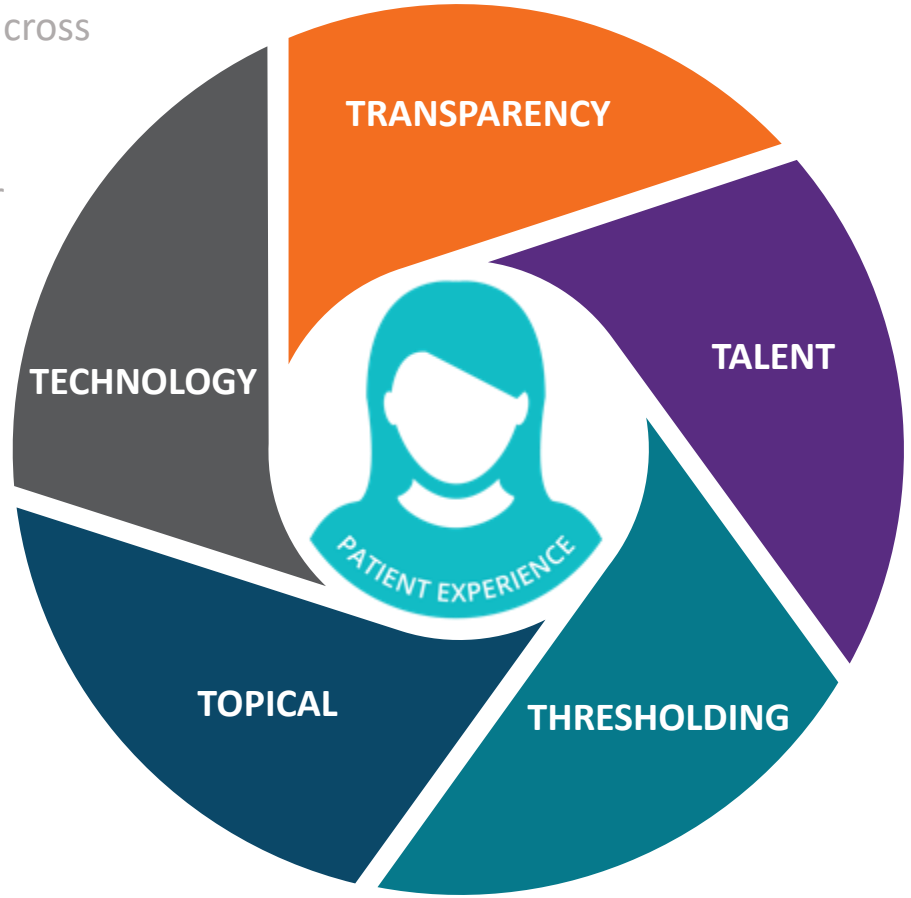
Ciox has created an industry-leading approach on compliance that delivers 99.997% accuracy

- **Ongoing reporting** of all activities
- **Full visibility** into any and all compliance incidents

- **Platform** that enables view across requests and performance management
- **Single centralized system** for compliance and security



- **Structural enablers** including central accountability
- **Thorough onboarding** supplemented in daily huddles
- **Ongoing, targeted training** created according to performance
- **Regular, informal sessions** with Compliance team

- **Proactive planning** aligned with federal and state policy discussions
- **Organizational integrator** to support success under changing policies

- **Baseline assessment** and ongoing measurement of performance against baseline and goals
- **In-depth privacy assessments** using OCR methodology

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Questions?

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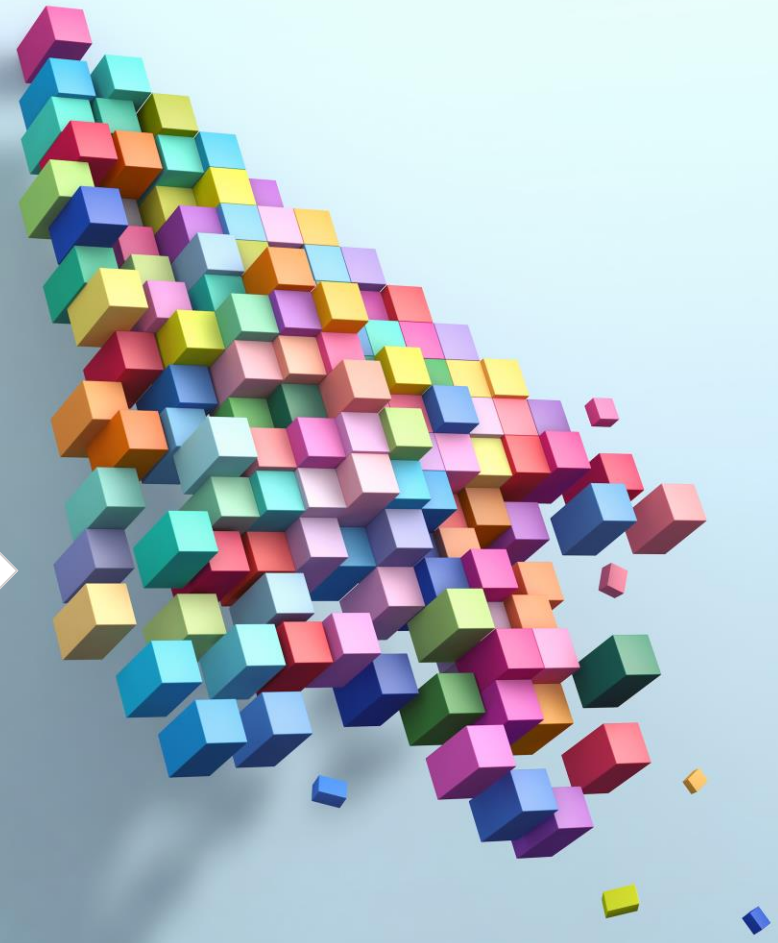

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Thank You

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