The University of Toledo
Trusteeship, Governance, and Audit Committee Meeting

“Audit Status Update”
“The University of Toledo Compliance Culture”

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Director of Internal Audit

December 12, 2011
FY2012 Annual Audit Plan Status

**Projects Completed (final reports issued)**
- College Of Graduate Studies
- University of Toledo Innovation Enterprises
- Student Financial Aid
- Research Grants and Grants Accounting
- Joint Commission Procedural Compliance

**Projects Where Fieldwork Is Complete**
- Faculty Workload/Academic Program Review
- Payment Processing (EDI – system transformation)
- PCI Compliance/Network Security
- Intercollegiate Athletics Revenue/Expenses
- Continuous Controls Monitoring (including ongoing “p-card” auditing)
- Outside Income (barter agreements, sports camps)
- Student-Athlete Recruiting

**Projects to Commence**
- Workload/Annual Report of Professional Activities
- Employee Medical Benefits
- Cash Handling and Cash Processing
- Clinical Informatics Systems (Meaningful Use)
- Departmental “Field” Audits
- College Reorganization (system transformation)
- IT General Controls
- Anonymous Reporting Line
- ICD-10 Preparedness
- Inpatient Hospital Billing
- Compliance and Privacy Update
- NCAA Football Attendance
Promoting a Culture of Compliance

The “Path Forward” to Avoid the Compliance Pitfalls Experienced at Penn State and Other Universities

• Do the right thing – always

• Recognize your vulnerabilities to:
  ➢ Self-deception
    ✓ No – we don’t always act as we predict we will
    ✓ We inflate our own virtues
  ➢ Unconscious biases and blind spots
  ➢ Fear

• Rationalization
  ➢ Beware the slippery slope
  ➢ An ethical lapse may lead to a violation of the law

Excerpt from the “Culture of Compliance” presentation delivered by Michael K. Maltbie from the Cleveland office of the Federal Bureau of Investigation.

Presentation was delivered to at the University’s leadership retreat on Wednesday, November 30, 2011.
Current Activities

Anonymous Reporting Line

Committees
• UTMC Compliance Committee
• UTP Compliance Committee
• HIPAA Committee
• Red Flag Committee
• ICD-10 Committee
• Access Committee
• Meaningful Use Committee
• Provider Based Committee
• Policy Committee

Monitor/Audit
• Billing Audits
• HIPAA Audits
• Investigations as necessary

Education
• HIPAA
• Medical Record Documentation
• Compliance
• Coding

Research and related new regulations and laws that impact the hospital, physicians and Main campus