

Leading the way in program integrity

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# Introduction

### Leading the way in program integrity

The U.S. healthcare system is undergoing rapid changes and growing steadily. Spending on healthcare has reached \$3.3 trillion, comprising nearly 18 percent of the U.S. economy. At the same time, federal program managers are facing the challenging task of ensuring healthcare programs meet mission objectives and public expectations. Advances in technology are changing the way they oversee and operate their programs while the ever-growing scope and complexity of care models is becoming increasingly difficult to navigate. These obstacles drive towards a need for more effective program integrity.

Improving the landscape for program integrity in federal healthcare hinges on clear strategies for accomplishing mission objectives and a structure that goes beyond chasing fraud, waste, and abuse. When establishing program integrity measures, leading organizations identify clear strategies for accomplishing mission objectives. They think of program integrity as strategic and preventive by focusing on key drivers of mission excellence and anticipating what could go wrong and what they want to avoid. They continually monitor mission results and risks as well as aggressively attack problems. They prepare for changing public expectations and changes to the environment in which the agencies' programs operate, including rapid technology advances and the ongoing transformation of the U.S. healthcare system. They see enabling intelligent automation, data and analytics, and other advanced technologies, as a means to eliminate repetitive tasks and make faster and better decisions; allowing employees to focus on strategic initiatives. Lastly, they seek to breakdown internal barriers, emphasizing the importance of collaboration, teamwork, and strong ongoing partnerships with key stakeholders, including the public.

KPMG's time-tested Program Integrity Framework serves as a guide to program managers in establishing these critical practices in their programs. This framework helps establish ongoing and effective communication with all stakeholders and gives program managers the access they need to critical information to make more informed decisions. KPMG's approach helps program managers focus on implementing and managing their program's mission.

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# Key findings

Program integrity, supported by the right tools and capabilities, seeks to foster program operational effectiveness, efficiency, accountability, and transparency while meeting the program's mission in serving the public.

A recent survey by the Government Business Council found<sup>1</sup>:



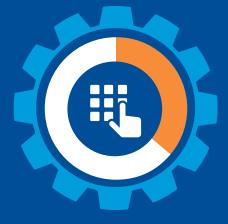
# 71%

of respondents said the main objective of program integrity is determining the best strategy to achieve program goals, while 53 percent said reducing fraud, waste, and abuse.



### **47%**

recommended increasing collaboration with internal stakeholders and hiring of needed skills as the greatest improvements to program integrity within their organizations.



**36%** think their program integrity framework is effective.

<sup>1</sup> "Maximizing Mission Integrity, A Candid Survey of Program Officers at Federal Healthcare Organizations," Government Business Council, June 2018.



Program integrity involves strategic and preventative measures that help program managers achieve their mission



### 77%

indicated their agency was effective at preventing improper payments when an effective program integrity framework was in place.



## **69%**

of those who use data and analytics to monitor and improve program operations find it meets or exceeds expectations.

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# Drive results

#### with KPMG's Program Integrity Framework

KPMG's Program Integrity Framework consists of five interconnected components that span the life cycle of a program: (1) governance, (2) eligibility and enrollment, (3) operations, (4) program oversight and monitoring, and (5) program improvement. The components allow for continual refinement of program operations to increase effectiveness and reduce stakeholder burden, all while factoring in strategies to mitigate risk and protect taxpayer dollars.

Application of the framework is agile and modeled to assist program managers to achieve their mission objectives. Depending on the operational maturity of a program, as well as current and anticipated challenges, program integrity concepts can be applied:

- At initial program implementation and design
- When dealing with major program changes, such as new legislation or regulation
- As a means for continuous program improvement, such as when faced with strained resources or needing to address changes in the current environment.

Our Program Integrity Framework will help program managers increase efficiency and effectiveness of their program through:

- A coordinated governance structure that flows throughout the program's operations
- Increased automation and application of leading analytic tools
- Proper implementation of cybersecurity measures
- Strong stakeholder collaboration
- Targeted training to expand and improve staff skill sets.

To help achieve success within an agency's program, our Program Integrity Framework encompasses the use of data and analytics and intelligent automation within each component. Applying our framework assists the program manager in establishing strong oversight and monitoring that includes predictive analytics for early detection of changes that could impact a program. Implementing process automation to handle routine tasks gives federal program managers the time and resources they need to focus on higher priorities and more complex work. In turn, applying the Program Integrity Framework can dramatically change the effectiveness and efficiency of how the program operates.





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# KPMG's Program Integrity Framework

Program improvement is essential in today's environment. KPMG's Program Integrity Framework includes interconnected components that work together to drive program improvement. The framework is designed to help government agencies be effective stewards of program resources as they endeavor to achieve the program mission.

#### ROGRAM IMPROVEMENT

#### PROGRAM IMPROVEMENT

#### Governance

Develops and maintains a well-defined organizational structure, integrating the responsibilities of key program stakeholders to establish cohesive regulatory guidance, program design, and ongoing risk monitoring through: — Revising governance and control framework

- Identifying risks and vulnerabilities across the program life cycle
  Assessing key performance metrics regarding
- program encouveriese.

#### PROGRAM IMPROVEMEN

#### Eligibility and enrollment

Defines and implements eligibility and enrollment requirements based on applicable laws, regulations, and policies by:

- Establishing, communicating, and training on
- eligibility and enrollment procedures
- Performing comprehensive data quality reviews
- Developing fraud mitigation strategy.

#### PROGRAM IMPROVEMENT

#### perations

Supports program functions, including distributing payments and collecting charges from program participants by:

- Developing/Revising, communicating, and
- training on program procedures
- Developing/Revising process documentation
- Performing pre-and post payment data validation.

RAM IMPROVEMEN

**ROGRAM IMPROVEMENT** 

#### **ROGRAM IMPROVEMEN**

#### **Key capabilities**

#### Cybersecurity

Working closely with agency teams, KPMG provides tools and resources to protect, detect, and respond to cyber threats to keep crucial data safe.

#### **Data and analytics**

KPMG provides trusted analytics to drive better decision making around policies and programs, improve operational efficiency, and mitigate enterprise and fraud risks for government agencies.

#### Intelligent automation

KPMG helps agencies incorporate intelligent automation to transform business processes, reduce costs, and improve citizen experience and work force satisfaction.



KPMG helps agencies understand the impact of risk on mission performance and uses that knowledge to help improve strategic, operational, and external activities.

**ROGRAM IMPROVEMENT** 

# Program oversight and monitoring

Measures the performance of programs by comparing results with program and agency goals, regulatory requirements, and documented procedures by:

- Performing operational reviews
- Assessing fraud indicators
- Anticipating and addressing audit readiness inquiries.

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