EMSA Compliance Program Update

- **Why Compliance Matters**
  - It's in EMSA's DNA – Mission & Values
  - Risk Reduction
  - Good Citizen / Public Image
  - Reduce External Pressure (OIG Watch list)
  - Prospect of Reduced Fines and Penalties
- **Board's Role**
- **What has the Compliance Program Accomplished?**
- **HIPAA and Data Security**
- **Key Compliance Focuses – External/Internal**
- **EMSA FY2027 Compliance Work Plan**

EMSA Compliance Program Update

The Board's Role – Provide oversight of the Compliance Program

EMSA Compliance Program Update

What has the Compliance Program Accomplished?

- Compliance program assessment and gap analysis initiated
- Compliance Program framework documents updated
- Notice of Privacy Practices posters – updated per regulation
- C23 Signature Requirements – updated to better align with regulations
- Adequate investigation process in place
- Ongoing audit and monitoring: Medicare audit, coding/HIM audits
- Compliance education maintained (annual, onboarding, signature requirements, AI reminders)
- Compliance Committee meetings

EMSA Compliance Program Update

HIPAA, Privacy & Data Security

- Integrated Compliance & HIPAA Framework - Strategic Alignment
- HIPAA oversight is a specialized pillar within EMSA's enterprise-wide compliance program.
- General compliance covers billing integrity, fraud and abuse laws, and workplace safety; HIPAA oversight focuses specifically on PHI privacy and data protection.
- EMSA Privacy and Information Security oversight operates within shared compliance infrastructure, using standard reporting hotlines, disciplinary guidelines, and leadership committees.
- The Information Security Officer provides status reports to the Compliance Committee, which are then reported to the Executive Committee of the Board.

EMSA Compliance Program Update

Key Compliance Focuses - External

Source	External Compliance Focus
OIG	Medical necessity failures, false documentation, improper destination billing, kickbacks, exclusion screening failures
CMS	PCS errors, improper level-of-service billing, origin/destination modifier errors, repetitive transport non-compliance
HIPAA	Missing risk analysis, inadequate safeguards, PHI exposure, improper disposal, breach notification failures
OCR	Ransomware, security failures, delayed breach reporting, lack of HIPAA policies
Oklahoma EMS Rules (OAC 310:641)	Licensure violations, staffing/credential failures, protocol non-compliance, equipment deficiencies, incident reporting failures
Oklahoma Statutes (63 O.S.)	Improper supervision, certification violations, scope-of-practice non-compliance
Oklahoma Tort Claims Act	Delays, collisions, negligent care, improper refusals, negligent hiring/training

EMSA Compliance Program Update

Key Compliance Focuses - Internal

1. Non-emergent transport medical necessity
2. Signature capture
3. Patient identification (not relying on hospital records)
4. HIPAA misunderstandings of what can and can't be done (especially frontline)
5. Social media misuse
6. COI disclosures – no formal process
7. Hotline awareness gaps – frontline awareness
8. Future use of AI

EMSA Compliance Program Update

EMSA FY27 Compliance Work Plan

FY27 – Q2 Work Plan	FY27 - Q3 Work Plan	FY27 - Q4 Work Plan
• Non-Emergent Transport Medical Necessity Review • Post-Payment Audit • Signature Capture Process Review • HIPAA Misunderstandings – education for frontline • Social Media Misuse – education for frontline • Hotline Awareness	• Patient Identification Process update • Conflict of Interest – Process Development • AI Project – Staff Guidance • Payment Posting & Reconciliation	• Technical Safeguards • Emergency Vehicle Safety • Conflict of Interest – Disclosure Campaign • Data Retention Process • Annual Compliance Program Evaluation • Annual Board Report • Clinical QA/QI Year-end performance review • High-Risk Review - Identify emerging risks • FY28 Work Plan