

## CASE STUDY



# Millennium Physician Group grows Compliance & Ethics structure with SAI360

## Background

Millennium Physician Group, founded in 2008, has grown to become one of the largest comprehensive independent physician groups in the USA, with more than 750 healthcare providers across 300 locations in Florida, Texas and North Carolina.

In 2014, the group became an Accountable Care Organization (ACO), contracted to deliver work under the Centers for Medicare and Medicaid Services (CMS). Alongside being a primary care ACO, Millennium has more than 30 specialties, including surgery centers, imaging, laboratory services, wellness programs, hospice, palliative care and home health.

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*– Tina Tolliver, Chief Compliance, Ethics & Risk Officer at Millennium Physician Group*



## Commitment to community

Tina Tolliver, Chief Compliance, Ethics & Risk Officer at Millennium Physician Group, explains: “Being an Accountable Care Organization allows us to deliver value across our community. A lot of physicians and practitioners want to work for an ACO because they want to have an impact and work within their communities, and they appreciate the opportunity to make changes within our industry.”

“We continue to succeed by delivering quality care to our patients and operating efficiently to deliver value to the CMS. We’ve been ranked as the first, second, and fourth leading ACO in the United States, a feat that stands out among 500+ ACOs,” says Tina.

Tina started at Millennium in 2017 and immediately recognized the operational value that SAI360 would bring. “From prior experience with the software and as a compliance professional, I knew SAI360 GRC Healthcare would add structure and help us build our compliance programs. I’m all for jumping in with both feet, so we implemented several SAI360 modules to create and transform processes spanning policy management, incident management, conflicts of interest, claims audit management, and third-party risk management.”

## Complying with a range of regulatory bodies

“We work to meet a variety of specific procedures, laws, and regulations because of the breadth of our business,” explains Tina. “As an ACO we work with CMS guidelines, while our surgery centers are AAAHC accredited, our home care practices are CHAP accredited, and our medical practitioners are associated with the AMA. Each area has different mandatory rules and policies to reflect the standards we want in place, so it’s vital to have the visibility, workflows, analytics, and processes to meet those requirements. That’s why we work with SAI360.

“When I started, I was the Ethics and Compliance team. Today we have a team of 17, structured in parallel with the SAI360 modules, with members assigned as leads and administrators. These are our on-hand subject matter experts for each area: policy, incidents, conflicts of interest, and third-party risk.”

Tina continues: “This structure and commitment to technology helps us attract new Compliance & Ethics team members. Candidates hear how we work, our dynamic approach, and the support and mentorship provided and are astonished at how forward-thinking we are.”

## Fundamental compliance processes supported by SAI360

“We use SAI360 for Incident Management,” says Tina. “There’s a range of incidents that happen within healthcare organizations, and no one wants a system of record that involves someone writing down an incident or a complaint and transposing it to a spreadsheet. Every organization will have common incidents and complaints and needs to be able to track where every single query came in, what type it is, and how it is handled, the metrics to resolution.

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“Once upon a time, we had a manual process for Conflicts of Interest (COI), so that is another area that demands process. SAI360 allows us to track our team and ensure transparency on not just the obvious things such as gifts and hospitality, but less tangible items such as directorships and speaking engagements.

“Across each module and platform, there’s peace of mind knowing there are workflows and processes in place. For example, our incidents are closed out within 30 days. That’s our policy, built into our Incident Management workflows. In the interest of operations and customer service, it’s crucial to ensure we are focused and working to meet metrics and deadlines.”

**“As well as the benefit of individual modules, there’s a benefit to a single platform such as SAI360,”** adds Tina.  
**“It drives operational efficiency and delivers consistency across documents, usability, reporting, and processes.”**

SAI360 is ready to support Millennium as needed, for example during COVID. Tina explains: “At the beginning of the pandemic we configured SAI360 Incident Management to capture all the COVID cases. At that point, COVID wasn’t an incident or a compliance exercise, it was something we needed to monitor. We built two different workflows within SAI360 – one for patients and one for our 4,000+ employees across 200 offices – and monitored on a day-by-day basis who was affected. We could make decisions, plan quarantines, report to health departments, and share data and insights on what was happening within our populations at a time of uncertainty.”

She goes on to add, “This ability to use SAI360 during COVID allowed our business to function and take care of patients and employees. A longer-term benefit is that we now have 4,000+ employees who know our incident management system – the icon is on every desktop, and all employees have used it. So, they know how to report incidents of any type.”

## Reporting to management

“When it comes to output and reporting, I believe more is more,” said Tina. “If I want, I can have 81 slides for a quarterly management meeting, thanks to the information from SAI360’s modules. We are a shining star for reporting because we have the data. We can show our leadership and board all the dynamic information, process

metrics and data to demonstrate our role in creating mechanisms for policies, incidents, contracts and other aspects of Compliance & Ethics. This level of detail shows the breadth and impact of what we do and shows our alignment to organizational goals.”

Tina adds: “SAI360 keeps us informed: you don’t know something’s working right if you don’t have the output.”

## SAI360: MORE THAN SOFTWARE

But the software is just one part of working with SAI360. According to Tina, “I know I can count on the support of my SAI360 account team, whether it’s to talk through ideas, think of new functionality, or consider adding other tools. SAI360 thinks about what’s best for our business and supports me wherever needed. We have a transparent and honest relationship, and I don’t need to pull punches. The SAI360 team is on my team.

“Compliance & Ethics is brimming with challenges and opportunities,” concludes Tina. “It’s no longer in the basement or away from the table but is recognized for its ability to transform an organization. I feel lucky to have the opportunity to do what I do, to have the technology and team to build out these programs, and contribute to an organization I believe in.”

## Our unified approach to risk sets us apart

Today’s complex risk landscape demands more. SAI360 leads the way with an integrated GRC platform and Learning solution that spans the entire risk and compliance spectrum.

### Risk Management Solutions

- Risk & Compliance Management Solutions
- Enterprise & Operational Risk Management
- Regulatory Compliance
- Policy Management
- Third-Party / Vendor Risk Management
- Internal Controls
- Internal Audit
- Incident Management
- Conflicts of Interest (COI)
- Gifts and Hospitality
- IT & Cybersecurity
- Business Continuity Management

### Ethics & Compliance Learning Solutions

- Anti-Bribery & Anti-Corruption
- Competition & Anti-Trust
- Conflicts of Interest
- Data Protection & Privacy
- Exports, Imports & Trade Compliance
- Harassment & Discrimination