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Newer COVID Risk Areas Include Vaccine Administration; More 'Risk Tolerance' Is Seen

By Nina Youngstrom

When Providence St. Joseph Health discovered that a large order of personal protective equipment (PPE) was fraudulent, the health system, which has hospitals and clinics in seven states, set a chain of events in motion.

“We had to track the supply, get it off the shelves, and identify where it went and who used it,” said Sheryl Vacca, senior vice president and chief risk officer, at the Health Care Compliance Association’s regional conference^[1] in Alaska Feb. 25. “It was a forensic investigation, right down to the person level to make sure they weren’t exposed to COVID while working for us. This was a tough thing.”

PPE fraud and issues around PPE testing and availability are some of the new and emerging compliance risks of the COVID-19 pandemic. Even though Providence St. Joseph Health’s supplier had given its assurance about the PPE, including N95 masks, “they didn’t meet the quality test,” Vacca said. “Hopefully, you can demonstrate you have a process where you looked at the integrity of everything.”

Vaccine administration is another new risk. “The Department of Justice has started to investigate the inappropriate administration of vaccines to people who don’t meet guidelines,” Vacca said. “I am aware of several organizations where the Department of Justice is looking into their activities around vaccine administration and not meeting eligibility criteria” from the Centers for Disease Control and Prevention (CDC). Most or all states have adopted CDC guidelines for the first and second priority groups (e.g., frontline health care workers, nursing home residents and people over age 75), according to KFF,^[2] although “in some cases, states are broadening and simplifying the priority groups.”

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