



# 5 top healthcare risks for higher education institutions in 2023

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The Crowe report "[25 Top Management Risks for Healthcare in 2023](#)" identified the top risks for hospitals and health systems in six areas:

- Clinical risks
- Emerging risks
- Financial and operational risks
- Legal and regulatory compliance risks
- New regulation risks
- Technology risks

Though the six areas are common among hospitals and health systems, a top risk area for one healthcare organization might not be a top risk area for another.

In addition, the same six top risk areas also are common to higher education healthcare organizations as part of their enterprise mission. Such organizations include academic medical centers, teaching hospitals, and university-affiliated healthcare facilities.

This special supplement to the original report identifies five healthcare risk areas specific to higher education institutions. As in the original report, Crowe identified these risk areas using input from risk assessment results and internal audit projects conducted by Crowe.

For each of the five areas of risk to higher education healthcare institutions, Crowe identified specific audits that internal audit and compliance teams should consider to mitigate those risks.



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# 1. Behavioral health

For many students, the start of their college career marks a major milestone in their lives as it involves a shift in responsibilities and reliance on their own abilities to manage time and stress. This shift can negatively affect the behavioral health of many students, especially if they lack the necessary coping skills. If the symptoms are left untreated, many students who previously might have struggled with mental health issues or who are struggling with them for the first time might develop anxiety, depression, or other behavioral health disorders.

To support their student populations, universities and academic medical centers make available a wide array of behavioral health services. Providing behavioral health services bears many risks if the necessary controls are not in place.

Risks related to behavioral health include:

- Lack of adherence to suicide screening and prevention protocols
- Poor care coordination procedures
- Inadequate care provision
- Inadequate care documentation

Not mitigating these behavioral health risks could have devastating effects for both students and institutions. For example, not adhering to suicide screening and prevention protocols puts students at risk via failure to screen or failure to continue providing behavioral health services. Other risks such as poor documentation caused by limited resources dedicated to behavioral health can result in patient harm and suboptimal care practices. In some cases, universities provide these behavioral health services, albeit limited and brief, free to students with the intentions of providing short-term care and, if necessary, connecting students with a community provider for long-term care. Without proper procedures for care coordination and assessment, students might not receive the care they need or might receive care at an inappropriate level, resulting in detriment to their mental well-being.

## **Audits for consideration to mitigate risks facing higher education healthcare institutions related to behavioral health**

- Suicide screening and prevention
- Behavioral health referrals and care coordination
- Behavioral healthcare provision and limitations

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## 2. Clinical trials

Clinical trials conducted at medical research institutions, universities, and hospitals test the efficacy of new drugs, new uses for legacy drugs, new medical devices, new surgical procedures, and more.

Both the federal government and hospital-based committees regulate the complex clinical trial process from beginning to end. Institutional review boards, whose members include physicians, scientists, and laypeople, develop and approve the protocols for specific clinical trials. Experts on data and safety monitoring committees track every trial as it progresses and monitor the safety of human participants. Some facilities use clinical trial management systems (CTMS) to help integrate quality, clinical trial revenue cycle, and risk management into the workflows of clinical trials. Even with the use of CTMS, facilities should evaluate their current stated policies and procedures to make sure they align with the CTMS.

In addition, higher education healthcare institutions should evaluate the clinical trial informed consent process to determine if participants meet eligibility requirements of the research study and are fully aware of the risks and benefits.

Without multiple controls in place, academic facilities are at risk of harming patients (and potentially facing lawsuits) or having patients drop out of studies.

Risks related to clinical trials include:

- Studies not conducted in accordance with clinical, ethical, and regulatory guidance and standards
- Participants not meeting study eligibility requirements
- Participants not fully aware of the risks and benefits
- Inability of systems to identify patients participating in clinical trials and properly bill for research-related care

**Audits for consideration to mitigate clinical trial risks facing higher education healthcare institutions include:**

- Institutional review boards
- Study enrollment
- Privacy informed consent
- Clinical research billing



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## 3. Physicians at teaching hospitals

Teaching hospitals receive federal money to train residents. When teaching physicians participate in the care of a patient and that involvement meets certain billing criteria, the teaching physicians may use their physical presence and documentation, along with the physical presence and documentation of any medical residents, to bill Medicare Part B and commercial payors a professional fee for their service.

If higher education healthcare institutions don't have effective operational controls and compliance monitoring in place, misfiring on such professional fee billing requirements can put academic medical centers and residency programs at elevated risk for potential billing fraud and abuse allegations.

During the public health emergency (PHE) that expired on May 11, 2023, teaching physicians could direct care and review medical resident services through real-time audio and video technology. As the PHE exemptions expire, teaching hospitals and residency programs must adjust their operations accordingly. Compliance experts expect the Department of Health and Human Services (HHS) Office of Inspector General and the Department of Justice to ramp up healthcare billing audit and enforcement activities again.

Risks related to physicians at teaching hospitals include:

- Not meeting billing criteria for teaching physician's oversight (or documentation of physician's oversight)
- Not meeting requirements to maintain accreditation with the Accreditation Council for Graduate Medical Education
- Inaccurate Medicare cost reporting resulting in lost or reduced Medicare reimbursement

### **Audits for consideration to mitigate risks facing higher education healthcare institutions related to physicians at teaching hospitals**

- Concurrent surgeries
- Graduate medical education (GME) oversight
- GME Medicare cost reporting

## 4. Student health centers

Most universities have on-site health services on their campuses to support students' social and physical health and well-being and to lessen educational disparity gaps. Student health centers might provide a wide range of health services, including urgent care, first aid, primary care, family planning, vaccines and immunizations, educational outreach, and mental health care. Though national accrediting organizations often review and accredit student health centers, universities still must provide medical and clinical risk oversight to verify the optimum level of accessibility, ongoing provider competency, quality and safety of care, privacy, and patient satisfaction.

In addition to clinical process risks, student health centers face potential risks related to their operational processes, including scheduling, registration, billing, referral management, test management, personnel screening and oversight, credentialing, controlled substance accountability, proper storage for all types of medications, and legal compliance. Given their relatively small size, student health centers might have informal operational processes or other unique processes that can put universities and students at risk.

Risks related to student health include:

- Failure of registration staff to obtain all necessary information (patient demographics, insurance verification and authorizations), leading to additional administrative costs and lost revenue
- Unrestricted access to systems, potentially resulting in unauthorized transactions or inappropriate review of patient accounts
- Inadequate clinical processes and workflows to prevent patient harm, reduce loss, avoid liability, and improve quality

### **Audits for consideration to mitigate risks facing higher education healthcare institutions related to student health centers**

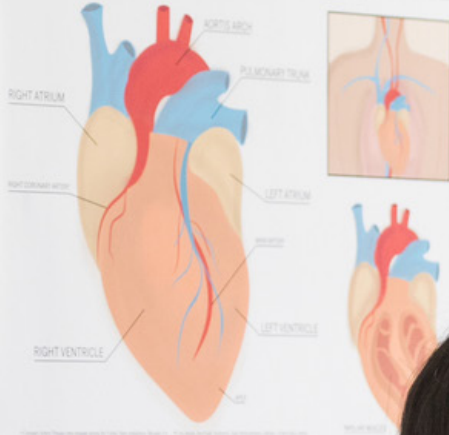
- Health center registration, scheduling, and billing
- Student health privacy
- Clinical process gap analysis



# TAL SYSTEM



# THE HEART



## 5. Student-athlete health and well-being

In 1905, President Theodore Roosevelt convened leaders from some of the U.S.'s top football schools and urged them to clean up the game. This led to the 1906 founding of what would become the NCAA with a goal "to regulate the rules of college sport and protect young athletes."<sup>1</sup> Recently, the NCAA has surveyed student-athletes on elements of their well-being,<sup>2</sup> and its athletic conferences have researched and focused on student-athlete mental health safety.<sup>3</sup> From routine treatment of injuries and therapies to a scary uptick in death by suicide,<sup>4</sup> universities have a role in safeguarding multiple modalities of their athletes' health. Universities are focused on the following areas:

- Head trauma and concussion
- Prevention of sudden death
  - Cardiac
  - Temperature/hydration
- Persistent/overuse injuries
- Emergency care
- Student-athlete well-being
  - Equity of medical care
  - Mental health
  - Nutrition
  - Sleep
  - Substance use
- Data-driven decision-making

Risks related to student-athlete health and well-being include:

- Failure of concussion management plan to meet or follow national guidelines
- Noncompliance of athletics programs, staff members, representatives, and student-athletes with NCAA constitution and bylaws
- Failure of the institution to establish and maintain an environment that enhances the physical, emotional, and mental well-being of its student-athletes

### **Audits for consideration to mitigate risks facing higher education healthcare institutions related to student health and well-being**

- Concussion management protocol
- Athletics program institutional control and compliance
- Student-athlete well-being

# Conclusion

When thinking of risks, academic organization leaders often include areas like research award compliance, student registration and admissions, international activities, compliance with campus crime reporting requirements, and NCAA responsibilities. But higher education institutions also operate healthcare facilities and provide patient care and must consider risks in those areas as well.

Provision of healthcare in the academic environment comes with all the risks of hospitals, health systems, medical practices, ambulatory surgery centers, outpatient clinics, and other traditional care settings. In addition, higher education institutions face healthcare risks related to caring for students and teaching medical students.

For each of the five areas of risk to higher education healthcare institutions, organizations should make sure internal audit and compliance functions are aligned, are achieving greater risk coverage, and are using data analytics to enhance efficiencies and achieve a better return on risk.



## Learn more

To learn more ways to expand your healthcare risk coverage, please contact the internal audit, risk, and compliance specialists at Crowe.

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<sup>1</sup> "History," NCAA.org, accessed July 5, 2023.

<sup>2</sup> "NCAA Student-Athlete Health and Wellness Study," NCAA.org, accessed July 7, 2023.

<sup>3</sup> For example, "Student-Athlete Health & Well-Being Initiative," pac-12.com, accessed July 7, 2023.

<sup>4</sup> Debby Waldman, "Student-Athletes Aren't Immune From Suicide Risk. Colleges Are Taking Notice." CBSNews.com, March 24, 2023.

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