Importance of Compliance Training
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About Tenet
- 49 Hospitals
- 117 Outpatient Centers
- 64,000 Employees
- 20,000 Contractors
- 16,000 Med. Staff Members

Some Data
- 2 million+ compliance training completions in the past seven years
- 10,000+ live general training classes
- 1,673 calls to our ethics action line in 2012
- 2,941 number of potential compliance issues worked during 2012
Some Annual Training Statistics

- General Compliance Training
  - 99.94% complete of 83,685
- Standards of Conduct Training
  - 99.83% complete of 17,772
- Clinical Quality Training
  - 99.98% complete of 56,808
- Billing and Coding Training
  - 98.7% complete of 3,630
- Focus Arrangements Training
  - 100% complete of 1,860

We’re lining up to take our annual compliance training.

Our Plan

Session Objectives

- Training infrastructure
- Goals of annual training sessions
- Scope of training
- Setting the focus of training
- Training methods
- Monitoring training
- Impact training can have on your organization
What Do You Want To Focus On?

• Mandatory vs. non mandatory
• Topics
• Live vs. online
• Implementing and Tracking
• Outcomes and culture

Infrastructure- Organizational Commitment

• Compliance Charter Requirements
  • Developing, providing and tracking General Ethics and Compliance Training
    • Two hours of training for new directors, employees, contractors and agents, within 30 days of employment
    • One hour of general refresher training each year thereafter

Infrastructure- Organizational Commitment

• Compliance Charter Requirements
  • Developing, providing and tracking Job-Specific training
    • Two hours of training for new employees, contractors and agents, that provide patient care services or who work in clinical quality, coding, billing, prepare cost reports or work with referral source agreements within 30 days of employment
    • One hour of Job-Specific refresher training each year thereafter
Infrastructure - Organizational Commitment

• Compliance Charter Requirements
  • Developing, providing and tracking:
    • Two hours of annual training on ethics and compliance and clinical quality oversight to the members of each hospital governing board

• Compliance Charter Requirements
  • Creating and disseminating the company’s Standards of Conduct and obtaining certifications of adherence to the Standards as a condition of employment, within 30 days of employment. Any material changes to the Standards should be timely communicated to all employees.

Infrastructure - Organizational Commitment – Mandatory Training

• Well defined policy on training
Infrastructure: Our Goals

....2) further Tenet’s goals of establishing an organization that (a) fosters and maintains the highest ethical standards among all Tenet employees, officers and directors, physicians practicing at Tenet facilities and contractors that furnish health care items or services; (b) values its compliance with all state and federal laws and regulations as a foundation of its corporate philosophy; and (c) aligns with Tenet’s core values of quality, integrity, service, innovation and transparency.

Infrastructure: Our Goals

• Delivery of Training
  • Minimum impact on operations
  • Train all employees within calendar year
  • 85% or greater approval of training
  • Weekly reporting of training completions
  • Accurate and timely reporting of training exceptions
  • 99.5% or greater overall training completion rate

Keep A Consistent Theme

We Still Define Compliance in Eight Key Areas

• Healthcare is compliant when it is:
  - Is Documented, Charged and Billed Correctly
  - Is Provided in an Approved Facility
  - Promotes Patient Rights
  - Is Reimbursed Correctly
  - Is Provided Without Financial Incentives
  - Is Medically Necessary
  - Is Provided by Qualified Physicians/Staff
  - Meets Quality Standards
Also Known As Eight Key Ways to Stay Out of Jail

Summary of Scope of Training

- Charter Requirements
  - General training Employee, Directors, Contractors, Governing Hospital Board Members
  - Job-Specific
    - Billing and Reimbursement
    - Arrangements
    - Clinical Quality
    - Excepted Physicians
    - Physicians
  - Standards of Conduct Certifications
- Other Compliance Related Training
  - Information Privacy and Security, Red Flags, HITECH
  - Clinical Research
  - EMTALA
  - ICD-10 Implementation
  - Other items within Tenet's eight key areas of compliance or Hot Topics

Setting the Focus of Training

- General Compliance and Ethics (New and Refresher)
  - Intertwine ethical decision making into all training topics
  - Identify the top 5 compliance issues to be covered based on
    - Hot-line calls
    - New key policy initiatives
    - Investigations
    - Audits
    - Consultants
    - Hot/New regulatory topics

Examples:
- Photos of patients
- Sexual Misconduct
- Discharge errors
- Level of care
- Case Management
- Drug company perks
- Budget
- Documentation
- Physician Arrangements
Setting the Focus of Training

Job-Specific Training – Clinical Quality Nursing
- Collaborate with Nursing Leadership
- Identify the major issues impacting patient care
  - Risk Management issues
  - Patient care challenges
  - Patient complaints
  - State inspections
  - The Joint Commission survey
  - Patient Safety issues

Examples:
- Allegation of Abuse
- Patient Identification
- Pressure Ulcers
- Chain of Command
- Strategic plan for Quality
- Licensure
- Patient privacy

Setting the Focus of Training

Job-Specific Training – Clinical Quality Non-Nursing (New and Refresher)
- Collaborate with Clinical Leadership
- Identify the major issues impacting patient care
  - Risk Management issues
  - Patient service challenges
  - Patient complaints
  - State inspections
  - The Joint Commission survey
  - Patient Safety issues

Examples:
- Allegation of Abuse
- Patient Identification
- Chain of Command
- Strategic plan for Quality
- Licensure
- Patient privacy
Setting the Focus of Training

- Job-Specific Training – Arrangements (New and Refresher)
  - Collaborate with Legal or outside counsel
  - Identify the major issues impacting arrangements with referral sources
    • OIG Investigations
    • Legal challenges
    • Regulatory updates
    • Revision to standard agreements
    • OIG Fraud Alerts

Specific Examples:
- Supporting documentation
- Non-monetary compensation
- Intent of agreement
- Market value of compensation
- Contract management
- Collection efforts

Setting the Focus of Training

- Job-Specific Training – Billing and Reimbursement (New and Refresher)
  - Collaborate with billing staff
  - Identify the major issues impacting claims processing and reimbursement
    • Claim denials
    • Request of records
    • Medicare Transmittals
    • Medical billing audits

Specific Examples:
- Incorrect use of modifier
- Bundled charges
- Late charges
- Re-billed claims
- Appeals and denials

Setting the Focus of Training

- Job-Specific Training – Cost Reporting (New and Refresher)
  - Collaborate with Chief Financial Officer
  - Identify the major issues impacting the filing and audit of cost reports
    • Medicare Audit Adjustments
    • Changes to Dispro rules
    • Graduate Medical Education
    • Medical billing audits

Work with CFO and Auditors to determine current topics of importance. Consider offering CPE for training.
Setting the Focus of Training

• Job-Specific Training – Governing Board Members (New and Refresher)
  – Collaborate with leadership team
  – Identify the major issues facing the Board
    • Quality of care initiatives
    • Medical Staff Oversight
    • Regulatory changes
    • Key compliance issues

Examples:
Physician credentialing and re-credentialing
Peer Review process
Medical staff applications
Oversight of quality of care
Support understanding of fiduciary responsibilities

Setting the Focus of Training

• Job-Specific Training – Medical Staff Physicians (New and Refresher)
  – Make all training available to Medical Staff members including Allied Health Professional
  – Making Governing Board training available can assist with physician buy-in to quality initiatives.
  – Offer CME credit for participation

Training Methods

• General Training
  – Live sessions offer the best learning opportunity. Design sessions that allow of active participation by the attendees
  – Live sessions should include senior management, no special session for leadership
Training Methods

• Job-Specific Training
  – Computer-based training enables:
    • Coverage of job specific materials
    • Testing for comprehension
    • Offering of several course to meet the training requirement
    • Different learning formats
      – lecture
      – Interactive
      – video

Natural Bias Can Work Against Us

Fig. 1

Everybody does it
This doesn’t affect anybody else
I know what’s best
We did one thing wrong...
I know it’s the right decision because...
Don’t bring me a problem
We need to act right now
Content With Style
• See it, Say it, Fix it

Training Methods
• Streaming Video
  – Easier then you might think:
    Sample Video

Training Methods
• Live and Taped Web-Based Session
  – Easier then you might think:
    Sample
Set Your Plan Up for Rollout And Tracking

- Think air traffic control
- Automation is key
- Consider Annual Report reporting requirements
  - Listing of Relevant Covered Persons
  - Schedule of Training Sessions
  - Number of individuals required to be trained, percentage of individuals actually trained
  - Number of individuals required to complete the Code of Conduct certification, percentage of individuals who completed

Learning Management System Offers

- Automated Assignments
- Electronic Certifications
- Email notifications
- Permanent transcripts
- Reports

How The Whole Thing Works

- Line of Business + Job-Specific Training code + hire date = training assignment (or not)
Monitoring Training
• Annual 120 day training season
  – Keep up the pace – don’t drag it out
  – Transparency is key to success
  – It’s not a race, but you’ll know if you’re behind
• Don’t be afraid to create some noise
  – Videos
  – Screen savers
  – Emails
  – Voice mails

Training Impact on Organization
• Over time it will create cultural change within the organization
  – 92.72% overall positive response in 2012
• Increase utilization of reporting mechanisms
• Generally it is the only training that reaches all employees
• Allows “hot topics” to be addressed or reinforced

Questions?