Beyond Checking the Box: Best Practices for Compliance Training Design, Delivery, and Evaluation

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Objectives

- Learn how a healthcare entity has applied the principles of adult learning and technology to advance its training efforts.
- Identify instructional design strategies and differences between in-person and online training approaches.
- Explore methods for evaluating the effectiveness of training.
- *Bonus: This session will utilize live interactive, anonymous polling to help you benchmark against peers.

What We’re Going to Cover

1. Regulations & Theories:
   - U.S. Department of Justice (DOJ) Guidance
   - Adult Learning Theory & the Association for Talent Development (ATD) Capability Model
   - Kirkpatrick’s Four Levels of Evaluation

2. Applying the Principles & Lessons Learned:
   Best Practices for Instructional Design & Evaluation
Federal Guidance: Training and Communications

- Training and Communications:
  - Another hallmark of a well-designed compliance program is appropriately tailored training and communications.
  - Ensure that policies and procedures have been integrated into the organization, including through periodic training.
  - Relay information in a manner tailored to the audience's size, sophistication, or subject matter expertise.
  - Practical advice or case studies to address real-life scenarios.
Federal Guidance: Training and Communications

- Does training adequately cover prior compliance incidents?
- How does the company measure the effectiveness of its training curriculum?
- How is it understood by employees in practice?
- Has the company provided tailored training for high-risk and control employees, including training that addresses risks in the area where the misconduct occurred?

Federal Guidance: Training and Communications

- **Form/Content/Effectiveness of Training** –
  - Form and language appropriate for the audience.
  - Online or in-person (or both), and what is the company’s rationale for its choice?
  - Testing employees and what’s done if they fail?
- **Communications about Misconduct** – What communications have there been generally when an employee is terminated or otherwise disciplined for failure to comply?
- **Availability of Guidance** – How has the company assessed whether its employees know when to seek advice and whether they would be willing to do so?
In the 1980s the American educator, Malcolm Knowles, described assumptions and principles of adult education, or andragogy, as opposed to pedagogy for younger persons.


See also:

1. Adults need to be involved in the planning and evaluation of their instruction.

2. Experience (including mistakes) provides the basis for the learning activities.
3. Adults are most interested in learning subjects that have immediate relevance and impact to their job or personal life.

4. Adult learning is problem-centered rather than content-oriented.
Certifications

CPLP – Certified Professional in Learning & Performance
  ▶ ATD Certification Institute
  ▶ https://www.td.org/certification/cplp/introduction

CHC – Certified in Healthcare Compliance
  ▶ Health Care Compliance Association
  ▶ https://www.compliancecertification.org/CHC/CertifiedinHealthcareCompliance.aspx

What are the Foundations of Learning & Performance?

▶ ATD’s Talent Development Capability Model is your blueprint for impact. It sets a new standard for the field. This future-oriented model can be personalized. It responds to those trends affecting talent development, such as digital transformation, data analytics, information availability, and partnerships between talent development and business.
▶ https://tdcapability.org/#/
Building PERSONAL Capability

Developing PROFESSIONAL Capability

https://www.td.org/capability-model
What are the Expectations for Compliance Course Completion?

- Meeting Regulatory Requirements.
- Maintaining Accurate Documentation.
- Reinforcing Training with Related Communication and Support.
- Enlisting senior leadership and directing managers to help drive completion.
- Ensuring relevance of training curricula and reinforcement.

What are Some Best Practices for Compliance Course Completion?

- Manage expectations and deadlines.
- Think outside the box.
- Leverage communications: Announcements, Emails, Reminders, Brochures/Cards, Videos, Plasma Screens.
- Regularly review and refresh New Hire Orientation, especially for different audiences.
- Work with business partners to develop targeted training.
- Use Compliance Week to promote the value of Compliance training and to drive completion.
- Launch Annual Compliance Training in Phases throughout the year.
What are The Four Levels of Training Evaluation?

**LEVEL 1 REACTION**
- Engagement
- Relevance
- Customer satisfaction

**LEVEL 2 LEARNING**
- Knowledge
- Skills
- Attitude
- Confidence
- Commitment

**LEVEL 3 BEHAVIOUR**
- On-the-job learning
- Encourage
- Reward

**LEVEL 4 RESULTS**
- Leading indicators
- Desired outcomes

Real-Life Examples of the Four Levels of Training Evaluation

- **Level 1: Reaction**
  - Survey at end of course.

- **Level 2: Learning**
  - Quiz at end of course.
  - 30-, 60-days post course Follow-ups:
    - FAQs.
    - Case Studies.
    - Email questions.
Real-Life Examples of the Four Levels of Training Evaluation

- Level 3: Behavior
  - Observation of Compliant behavior and performance.
  - Reduction of Hotline complaints, HR disciplinary actions, coding & billing errors.

- Level 4: Results
  - Reduction of non-compliant behavior.
  - Decrease or elimination of audit findings and fines.
  - Decrease of "match found" items on exclusion/sanction checks.
  - Maturation of overall Compliance Program, measured against the 7 (or 8) Effective Elements.
  - Increase of positive results in Compliance reporting, internally & externally.

Contact Us

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