

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

HCCA ANNUAL COMPLIANCE INSTITUTE
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Presented by



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Objectives

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- ▶ 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.

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What We're Going to Cover

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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



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Federal Guidance

U.S. Department of Justice



U.S. Department of Justice
Criminal Division

Evaluation of Corporate Compliance Programs

Guidance Document
Updated: April 2019

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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.

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Federal Guidance: Training and Communications

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- ▶ 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?

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Federal Guidance: Training and Communications

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- ▶ **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?

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Malcolm Knowles

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In the 1980s the American educator, Malcolm Knowles, described assumptions and principles of adult education, or andragogy, as opposed to pedagogy for younger persons.

Knowles, M. (1980). *The modern practice of adult education: Andragogy versus pedagogy*. Rev. and updated ed. Englewood Cliffs, NJ: Cambridge Adult Education.

Knowles, M. and Associates (1984). *Andragogy in action: Applying modern principles of adult learning*. San Francisco: Jossey-Bass.

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Malcolm Knowles

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See also:

<https://elearningindustry.com/the-adult-learning-theory-andragogy-of-malcolm-knowles>, Accessed Jan. 30, 2020

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Knowles' 4 Principles of Andragogy (adult learning)

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

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Knowles' 4 Principles of Andragogy (adult learning)

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2. *Experience (including mistakes) provides the basis for the learning activities.*

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Knowles' 4 Principles of Andragogy (adult learning)

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3. *Adults are most interested in learning subjects that have immediate relevance and impact to their job or personal life.*

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Knowles' 4 Principles of Andragogy (adult learning)

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

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Certifications

CPLP – Certified Professional in Learning & Performance

- ▶ **ATD Certification Institute**
- ▶ <https://www.td.org/certification/cplp/introduction>

CHC – Certified in Healthcare Compliance

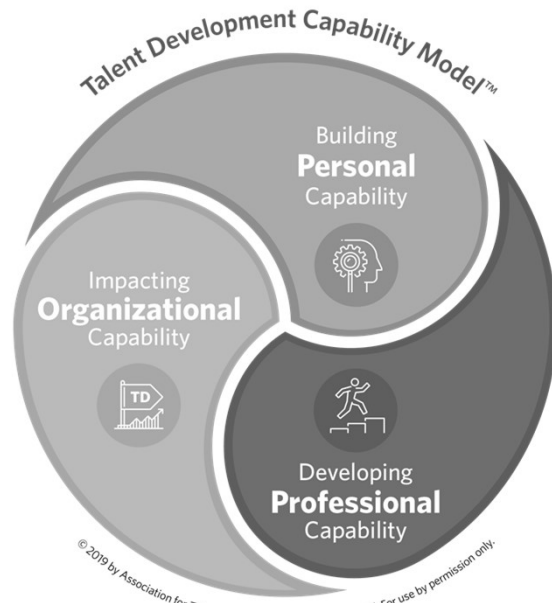
- ▶ **Health Care Compliance Association**
- ▶ <https://www.compliancecertification.org/CHC/CertifiedinHealthcareCompliance.aspx>

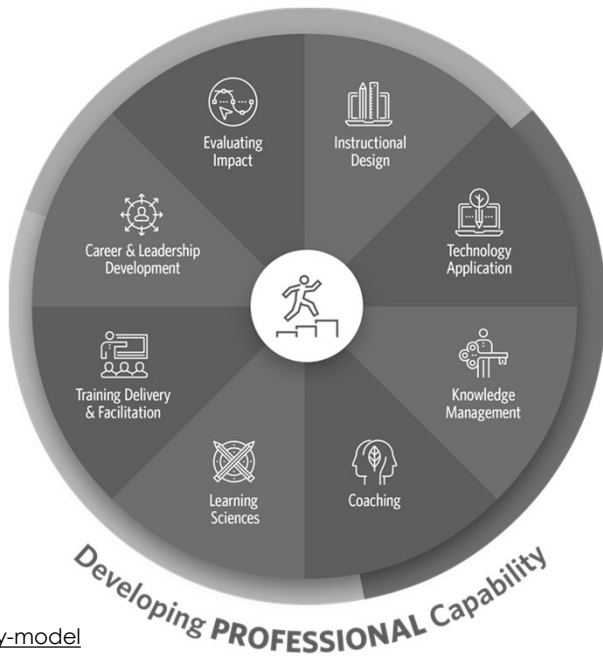
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What are the Foundations of Learning & Performance?

- ▶ **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/#/>

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<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.



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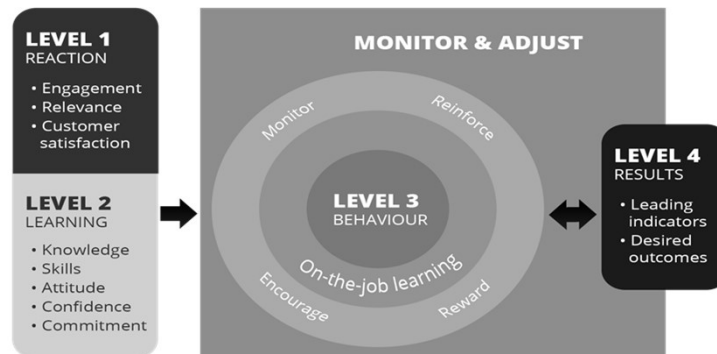
What are Some Best Practices for Compliance Course Completion?

- ▶ 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.

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What are The Four Levels of Training Evaluation?

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Real-Life Examples of the Four Levels of Training Evaluation

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- ▶ 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.

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Real-Life Examples of the Four Levels of Training Evaluation

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- ▶ 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.

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Contact Us

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