



Connecting with Compliance



Creative Compliance, Training and Education Methods

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Presentation Highlights



- ★ Background Information
 - Network Health
 - Compliance & Corporate Training Structure
- ★ Engagement Efforts
 - Effective Training Program
 - Increasing Presence of Compliance
 - Fostering creativity
- ★ Effectiveness
 - Why Measure Effectiveness?
 - Ensuring Program Effectiveness
 - Methods of Measuring Effectiveness

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Network Health - Background

- ★ Founded in 1982, Network Health offers customized commercial and Medicare health plans to employers, individuals and families in more than 16 counties throughout northeast Wisconsin and beyond
- ★ Network Health serves more than 135,000 members, including over 63,000 Medicare beneficiaries
 - More information about Network Health is available at www.networkhealth.com, www.facebook.com/networkhealthwi and at www.twitter.com/networkhealthwi

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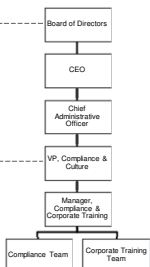
Compliance Program

★ The Compliance Program includes, but is not limited to, the following areas of focus:

- Compliance Officer and Compliance Committee
- Written policies and procedures and standards of conduct
- Effective training and education
- Effective lines of communication
- Enforcement of standards
- Monitoring and auditing
- Prompt responses to detected offenses



Compliance & Corporate Training



- ★ Having Corporate Training under compliance allows for:
 - Better controls and monitoring of necessary trainings
 - Faster turnaround on research and generation of training for new/updated regulations
 - Direct access to training results to determine associate understanding of requirements of their job
- ★ This also increases the visibility of training within the organization





Engagement Efforts Effective Training Program



Effective Training Program




CORPORATE TRAINING

Our goal is to deliver innovative training with you as a partner.


Together we can provide excellent service to all, exceeding expectations by delivering your WOW factor.




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Effective Training Program

- ★ Strive to be pro-active with training
 - both onboarding and ongoing
- ★ Hybrid approach to trainings
 - In person, computer based module (CBT) and passive trainings
 - Tailored to the audience & level within the organization (Board of Directors, Senior Leaders, Compliance Committee Members, etc.)
- ★ In order to receive the general wage increase, associates must complete all assigned trainings on time
 - Helpful to ensure motivation to complete
- ★ Records of training are maintained in one system of record
 - Ensures easy reporting
 - Includes attendance logs and materials distributed







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Effective Training Program

- ★ Dedicated trainer for each functional area
- ★ Regular training touch points
 - Monthly meetings between the corporate trainer and the leaders of the functional areas
 - Monthly meetings with the corporate training team and compliance leadership
- ★ Regular touch points keep the focus on continuous process improvement of the training program and to comprehensively review progress & opportunities

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Effective Training Program

- ★ Corporate Trainers are responsible for:
 - Successful implementation of all required internal trainings
 - Meeting with leadership of functional areas to personalize training curriculums for associates
 - Tailoring training to the specific audience intended
 - Responding to newly released guidance from a training perspective
 - Developing innovative ways to determine and assess effectiveness of trainings conducted
 - Maintaining documentation of trainings
 - Ongoing evaluation of the corporate training program



Effective Training Program

- ★ Identifying training opportunities
 - Review compliance intake forms & other reporting mechanisms (hotline) for trends
 - Annual risk assessment process
 - Involve both front line associates and leaders in the risk assessment process
 - Trainings can be identified from high risk results
 - Utilizing prior audit experiences
 - Consider the opportunities identified after regulator audits
 - Mock/internal audits based on audit protocols serve well for identifying training opportunities
 - **IMPORTANT:** Internal audits should always identify training opportunities and should be documented and acted upon in a reasonable timeframe





Engagement Efforts Increasing the Presence of Compliance

Increasing the Presence of Compliance

★ Ensure compliance is at the table for Operational Committees, Policy Committees, Strategic Projects

- Build relationships
- Set up touchpoints with distant departments
- Keep compliance integrated into all facets of daily work and conversations
- Join operational calls with FDRs



★ Involve the entire team in annual compliance events



Increasing the Presence of Compliance

★ Have the entire team participate in compliance committee

- Provides opportunities to present on topics and gives compliance team more visibility within the organization

★ Engage compliance committee in annual training event


- Compliance BOOTCAMP
 - Specifically tailored for the compliance committee to train them on their roles per the Chapter 9 guidelines





Engagement Efforts Fostering Creativity





Fostering Creativity

- ★ Annual Compliance Training Event
 - Coordinated during **Compliance Week** in November
 - Participation of employees at all levels in the organization in both active (activities/meet and greets) and passive (trivia/word search) compliance related events
 - Prizes are offered for participation
 - Snacks are provided
 - Provides the compliance team a chance to be creative with time, activities and budget






Fostering Creativity


2016
Vote for
Compliance




Fostering Creativity

- ★ Annual Compliance Committee Training Event
 - Specifically tailored to train the committee on their roles per the Chapter 9/21 guidelines
 - Used as an opportunity to offer reminders for compliance processes
 - Builds relationships and partnerships with various departments
 - Attendance is driven by refreshments and fun prizes




Program Effectiveness

Why Measure Effectiveness?

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Why Measure Effectiveness?



- ★ The sponsor's governing body must be knowledgeable about the content and operation of the compliance program and must exercise reasonable oversight with respect to the implementation and effectiveness of the compliance program
- ★ The governing body should be knowledgeable about compliance risks and strategies, should understand the measurements of outcome, and should be able to gauge effectiveness of the compliance program




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Why Measure Effectiveness?

- ★ Shows prevention of program noncompliance or potential FWA issues through review and addressing of reports of monitoring and auditing in risk areas
- ★ Detects noncompliance and FWA issues through monitoring and auditing, whether root cause was determined and if corrective actions were appropriately and timely implemented
- ★ Shows implemented corrective actions are working



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Program Effectiveness

Ensuring Effectiveness

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Ensuring Effectiveness


- ★ Review compliance program performance and assessment results
- ★ Utilize training, education, compliance policies and procedures, and Standards of Conduct to show compliance with all program requirements
- ★ Use internal monitoring and audits to evaluate the plan's (including FDRs) compliance with requirements and the overall effectiveness of the compliance program
- ★ Sponsors must audit the effectiveness of the compliance program and the results must be shared with the governing body




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Ensuring Effectiveness

- ★ While compliance department staff may not conduct the formal audit to measure effectiveness of the compliance program, less formal measures may be administered such as a self-assessment tool, dashboard or scorecard in support of the audit
- ★ The compliance officer must receive regular reports from the audit department or from those who are conducting audits regarding the results of auditing & monitoring activities and the status and effectiveness of corrective actions taken




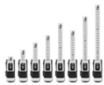


Program Effectiveness
Methods to Measure Effectiveness

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Methods to Measure Effectiveness


- ★ Employee Feedback
 - Keep anonymous
- ★ Surveys upon completion of compliance trainings
 - Ask questions like “who is your compliance officer” and “what is the purpose of a compliance program”
- ★ Annual Check Point Audits
 - Conducted by trainers or management to assess understanding of trainings
 - Department specific and general questions to document effectiveness and respond where gaps are identified




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Methods to Measure Effectiveness

- ★ Conduct a culture or engagement survey which includes compliance focused questions
 - Sample questions:
 - If I encountered an ethical or compliance question or problem at my organization, I would know what procedure to follow.
 - If I identified an ethical or compliance issue at my organization, I would know how to report the concern.
 - I would feel comfortable raising an ethical or compliance concern to my immediate supervisor (my administration) or someone else in management.





from answers to action



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Methods to Measure Effectiveness

- ★ Exit interview questions focused on compliance engagement and connectivity
 - Ask departing employees about compliance effectiveness
 - Have human resources or CEO conduct
 - If exit interviews are not being done, the Compliance Officer can conduct them as well
- ★ Measure Participation in Events
 - Hold events that count (don't hold them just to have them)
 - Keep track of participation
 - Take credit and document efforts – This is huge for demonstrating effectiveness
 - Regulators want to see proof




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Questions



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