Compliance Program in a Small Hospital
Hawaii HCCA Annual Regional Conference
October 14, 2016

Kahuku Medical Center
- Critical Access Hospital on O'ahu
- Chapter 11 Bankruptcy Reorganization in 2007
- 21 beds (6 LTC / 15 SWING)
- 7000 ER annual visits
- Lab, Radiology, Rehab
- Primary Care (2015)
Before & After

<table>
<thead>
<tr>
<th>Pre 2011</th>
<th>Post 2011</th>
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<tbody>
<tr>
<td>Assistant Administrator</td>
<td>CEO</td>
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<tr>
<td>Operations</td>
<td>CHC expired</td>
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<td>CHC</td>
<td>Compliance Program at a stalemate</td>
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<td>Compliance Program developed and implemented</td>
<td>Bare minimum</td>
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<tr>
<td>Contracts – Stark analysis</td>
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<td>Risk program</td>
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<tr>
<td>Participated in HHSC’s Compliance group</td>
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Challenges

- Limited resources
- Complex regulations - staying up to date
- Low volume of incidents (as compared to urban counterparts)
- Defining roles (we wear many hats)

Strengths

- Resilient!
- “Jack of all trades is a master of none, but oftentimes better than a master of one.”
- Culture of Accountability
- We’re small and mobile enough to implement programs quickly
- Employees work and live in our communities and are very vested
- We provide quality care for the services we offer
Opportunities

1. Look at what you currently have in place
2. Conduct Risk Assessment – tools, contractor, in-house
3. Prioritize – continue to revisit assessment
4. Control what you can control