Carolinas HealthCare System
Charlotte, North Carolina
Corporate Compliance Department

“Compliance -- Keeping up Awareness”

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Discussion Points

A. What is the OIG expectation of compliance awareness as an element of effectiveness?

B. As compliance professionals, do we routinely “make the connection” with staff and daily operations?

C. What are some approaches to promoting “Compliance Awareness” initiatives to reach all levels of staff?
The mission of the Carolinas HealthCare System is to create and operate a comprehensive system to provide health care and related services, including education and research opportunities, for the benefit of the people it serves.

- 23 owned, managed or leased hospitals and healthcare delivery facilities in two states
- Over 24,000 employees
- Combined gross patient revenues in excess of $2.5 billion
- Largest health care system in the Southeast
- Third largest public, multi-hospital system in the nation
- 500 physician provider organization with over 100 offices in 11 counties
- GME Program, includes 10 Specialties, 135 faculty physicians and 200 physician residency positions
Carolinas HealthCare System—Core Values

Mission

Vision

Commitment

Integrity

Caring

Teamwork

CHS Corporate Compliance Program
Compliance Awareness and the Effective Compliance Program

1. Written standards of conduct, including policies and procedures
2. Designation of a Chief Compliance Officer & appropriate bodies
3. Conduct regular, effective education and training programs
5. System of response and discipline related to allegations of improper activities
6. Use of audits and/or other evaluation techniques to monitor compliance
7. Investigation and remediation of systemic problems, and policies regarding sanctioned individuals.
Conducting Effective Training and Education

“The proper education and training of corporate officers, managers, employees, physicians and other health care professionals, and the continual retraining of current personnel at all levels, are significant elements of an effective compliance program.”

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Compliance Awareness and the Effective Compliance Program

1. Fundamentally compliance efforts are designed to establish a culture that promotes prevention, detection and resolution.

2. In practice the compliance program should effectively articulate and demonstrate the organization’s commitment to the compliance process.

3. The existence of benchmarks that demonstrate implementation and achievements are essential to and effective program.

4. Eventually a compliance program should become a part of the fabric of routine hospital operations.
How does the compliance professional answer these “how aware are your staff” questions—?

- Is your compliance program “working” for all levels of the organization?
- Have you done enough to communicate the compliance message to all employees?
- Does the average employee find compliance relevant to their daily responsibilities?
- Are you keeping the compliance message fresh to promote ongoing staff and leadership interest?
**CHS Compliance Awareness Initiative**

**Compliance Staff Buy-in: Support for the Awareness Initiative**

- Gather feedback regarding the compliance program
  - Talk with those who support the compliance program within and outside the compliance department.
  - Survey staff perception of the compliance department and compliance culture

- Identify internal Program goals to address compliance awareness deficits
  - Enhance compliance consistency among all Compliance Directors
  - Greater Facility Administrator involvement
  - More education from Compliance Department
  - Improve departmental accountability for compliance
CHS Compliance Awareness Initiative

Leadership Buy-in: The Awareness Initiative Vision

- Discuss the value and opportunities for renewed staff awareness
  - Focus on compliance as a daily individual responsibility
  - Share benchmarks from Employee Compliance Effectiveness Survey
  - Provide new *System of Integrity* books to all employees
  - Promote confidentiality and appropriate HelpLine use
  - Opportunity to educate staff on updated or new Corporate Compliance Policies
  - Address data and issues noted in HelpLine calls
CHS Compliance Awareness Initiative

**Compliance Awareness “Theme”:** Making the anticipated event familiar.

- Select a “catch phrase” to educate and remind all staff on the goal for the awareness initiative
  - “Compliance is everyone’s job!”
  - “Compliance is our Culture!”
  - “You are the CHS System of Integrity!”
  - “Compliance—is it in you!”

- Get leadership commitment to support planning and to participate
  - CMC President letter to all facility employees announcing the event date.
  - Sr. VPs sponsored the “prize” for the department with the highest level of participation
  - Sr. Vice Presidents presence during the events
CHS Compliance Awareness Initiative

Compliance Awareness: Marketing the Initiative

- Ensure event hosts are advised to get the word out early and often
  - Build internal and external enthusiasm to make the work fun—pizza party for the planning and event team
  - Publicize the upcoming event on the intranet and internal newsletters
  - Use quotes from the leadership announcement letter to post around the event areas and facility
Compliance Awareness: Marketing the Initiative (continued)

- ... get the word out early and often

- Select the first sponsoring facility or department—volunteers first!

- Ensure the event activities are covered by Marketing for future “promotion” and education efforts.
Compliance Awareness: Planning the Initiative

- Ensure event hosts are educated on available resources for support and planning
  - Develop a project plan for the event and assign responsible parties
  - Develop basic tools and templates for other facilities or departments to easily duplicate activities
  - Tap into other planned events that will elicit large numbers of employee participants—employee fairs and socials
Compliance Awareness: Planning the Initiative (continued)

- Plan event activities and times that are staff and facility friendly
- Build in an element of competition for participation—reward departmental participation
- Decide on the focus of your awareness efforts—specific policies, compliance industry events, compliance personnel to know, basics of compliance effectiveness, identified helpline trends, survey data, frequently asked questions
**Compliance Awareness: Implementing the Initiative**

- Ensure event hosts are educated on event activities and desired outcomes

  - Get assistance from other department’s---Administration, Human Resources, Marketing/Public Relations, HIPAA participants, High Risk Departments, Compliance Staff

- Tap into other planned events that will elicit large numbers of employee participants
Compliance Awareness: Implementing the Initiative (continued)

- Event activities and desired outcomes
  - Select the event set-up—displays, videos, one-one interactions, games
  - Make sure the activity area is inviting and exciting—high traffic zones
  - Reward employee efforts to learn and participate
Compliance Awareness: *During the Initiative*

- Make each employee feel like a personal guest of compliance!
  - Elicit employee feedback regarding their experience with the compliance program
  - Introduce staff to members of the compliance team and Facility Administration
CHS Compliance Awareness Initiative

**Compliance Awareness:** *During the Initiative (continued)*

- .... employees are guests of compliance!
  - Track Participation Rates—registration by name and department
  - Offer commemorative “gimmies” for the educational experience—key chains, pens, logo items and FOOD!
  - Provide recognition and incentive for staff participation in the compliance education process
CHS Compliance Awareness Initiative

Compliance Awareness: Following the Initiative

- Ensure event hosts are educated on desired post-event outcomes
- Be prepared to show your outcomes in terms of participation and increased awareness
  - total participants,
  - number of participants per shift,
  - participation rate by department or employee classifications,
  - “prize winners” by department or employee category,
  - number of non-helpline calls and consultation requests,
  - survey response and results by department and employee classification
- Elicit employee feedback post event—post event survey
- Be available for follow-up meetings with staff regarding survey comments and questions asked during the event.
CHS Compliance Awareness Initiative

**Compliance Awareness:** *Taking the initiative beyond the event*

**New Manager Orientations**— Program for all staff transitioning into managerial roles.

Have conducted 13 Compliance Responsibility programs and educated approximately 330 new or recently promoted managers in past year.

- Compliance program structure and policies
- Elements of effectiveness
- How to conduct and/or participate in audits and investigations
- How to assist employees with various compliance issues
- Case scenarios for decision-making
- Ongoing compliance education requirements
CHS Compliance Awareness Initiative

**Compliance Awareness**: *Taking the initiative beyond the event*

Other awareness initiatives:

- **Compliance teleconferences**— recorded to allow department managers and staff to check-out of the compliance library.

- **Compliance link on intranet**— for employee access and questions

- **Compliance Program “User Website”**— online compliance tools and documents for compliance staff outside the Compliance Department.

- **Compliance Newsletter**— updates on current compliance issues

- **Compliance E-mail Groups**— routine compliance reminders for managers of line staff to provide “compliance moments”
Taking the initiative beyond the event.....encourage HCCA to endorse

National Compliance Awareness Week--Is compliance worth it—yes!

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