

**Compliance Programs
In
Your Practice Setting**

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OUTLINE

Background

Compliance Program Essential Elements

Written Policies & Procedures

Designation of Compliance Officer & Committee

Conducting Effective Education & Training

Developing Effective Lines of Communication

Auditing & Monitoring

Enforcing Standards Through Disciplinary Guidelines

Responding to Detected Offenses

Developing Corrective Action Plans

Assessing Effectiveness of Your Compliance Program

Summary

Questions & Discussion

The United States Federal Sentencing Guidelines and the Office of the Inspector General (OIG) have issued guidance for the development of healthcare compliance programs. These guidelines (referred to as the 7 steps) address the following elements:

- **Implementation of written policies, procedures and standards of conduct. There isn't a person in this room who hasn't seen a rehab P&P manual. You can go to that and begin modifying when you customize a compliance program for your practice.**
- **Designate a high-level compliance officer & other appropriate officials. Large hospitals have Corporate and Chief Compliance Officers. In smaller practices, just designate the person who it makes sense to do so as the compliance officer. If you are the owner, it is not a good idea to appoint yourself. Employees may hesitate to bring issues to your attention if you are perceived as retaliatory.**
- **Develop training & education about compliance. This can be added to your new employee orientation & then done annually by everyone, including your vendors. Many put compliance slogans on computer monitors along with the compliance hotline number or confidential email address. Ex. Of a slogan: ETHICS RULES!**
- **Enforcement of standards through well-publicized disciplinary procedures. A concise statement that all questionable actions will be investigated & appropriate disciplinary action will be taken is sufficient.**
- **Measures for Receiving Complaints: Hotlines, secure voicemail, secure email or even a plain old box kept in a place all employees is fine. Keep a log of complaints & concerns.**

- **Performance of Internal Audits: monitoring & auditing are important. We do this anyway as clinical supervisors & program directors or senior clinicians. I suggest you test your billing staff using hypothetical scenarios. Use whatever you already use to evaluate clinicians' actual work product & documentation.**
- **Prompt Response to Detected Offenses through Corrective Action: Developing corrective action initiatives...you should promptly report to the appropriate government agency (60 days or less) after determining there is credible evidence of a compliance violation.**
- **Reevaluate your compliance plan/program annually.**

Resources

Council of Ethical Organizations/The Health Ethics Trust

CCP= Certified Healthcare Compliance Professional

CCE=Certified Healthcare Compliance Executive

214 South Payne Street Alexandria, Virginia 22314

703-299-7916

Health Care Compliance Association (HCCA)

CHC= Certified Healthcare Compliance

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Centers for Medicare and Medicaid Services (CMS)

www.cms.hhs.gov

Institute for Healthcare Improvement (IHI)

www.ihl.org