



5 Small Tweaks that Could Have a Big Impact on Your Compliance Program

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Small Tweaks for Big Gains

You want to improve your compliance program but just don't have the time for a total overhaul at the moment. Well, have no fear, because there are a few small tweaks you can make that can have a huge impact on your program. And the good news is that it's easier than you think.

1

STEP BACK AND GET A COMPLIANCE PROGRAM EFFECTIVENESS REVIEW.

Sometimes it can be difficult to take a step back from the day-to-day grind of putting out compliance fires, managing audits or answering leadership's immediate questions. But at some point, it's essential to get a high-level view, or assessment, of your compliance program's overall effectiveness.

When the DOJ is involved in investigations and/or resolutions it considers "the existence and effectiveness of the corporation's pre-existing compliance program" and the corporation's

remedial efforts "to implement an effective corporate compliance program or to improve an existing one." It makes the most sense to periodically (and on a regularly scheduled basis) to have a compliance program effectiveness review performed. Most organizations might do this internally on an annual basis and bring in an external set of eyes to perform such a review at least every three years.

20 years ago, the talk may have been about creating a compliance program as an end-all-be-all, but just having a compliance program isn't good enough anymore. You need to be regularly assessing whether it's proving effective and your organization needs to have objective evidence and documentation that this is being done on a regular basis. And while this might seem like a lot of work, I promise once you do it the first time, it'll become like riding a bike.



2

TEST THE WATERS OF INDEPENDENCE

There comes a time in just about every compliance program that will test the true independence of the compliance program. Is the program simply "window dressing" or does it have real stature, authority, and independence within the organization? About such independence, the OIG has stated, "Evaluation of independence typically includes assessing whether the function has uninhibited access to the relevant Board committees, is free from organizational bias through an appropriate administrative reporting relationship, and receives fair compensation adjustments based on input from any relevant Board committee."

If your program has hit a roadblock that is preventing true compliance improvement, take the plunge and test the waters of independence, pulling out all stops. It's better to find out sooner, rather than later, if the organization

is truly serious about having an independent compliance program.

3

LEARN THE IMPORTANCE OF HOLDING REGULAR “POST-MORTEMS”

In short, a post-mortem is the process of assessing what went right and wrong in a situation with the intent of making improvements for when something similar occurs in the future. In compliance contexts, just like any situation, mistakes are made with how an incident was handled, how an issue was corrected (or not corrected) or how an internal investigation unfolded.

One small tweak you can make right now is to institute the practice of performing a “post-mortem” on how any significant compliance issue was handled. Your documented observations and the lessons you learned can pay huge dividends in the improvement on your future performance.

4

STRENGTHEN A RELATIONSHIP THAT IS STRUGGLING

The most effective compliance programs are those that are in it for the long haul. They grow and change with the organization itself. That kind of success does not happen in a vacuum. It happens predominantly through relationships with key personnel and leadership within the organization.

We’ve all had work relationships that haven’t been as good as they could have been. So I task you to identify one crucial work relationship that could use some improvement and focus on making it better for the remainder of this year. You’ll be amazed by just how much frustration and red tape can be removed from your job.

5

GO BEYOND “CHECKMARK” TRAINING

A lot of compliance programs are doing their best just to get some mandatory training

completed for *most* of their employees. While that’s not a bad thing, compliance training needs to go beyond “checkmark” training, or training that is done just to check that training mark box off your compliance menu.

To go beyond this minimal training, your program should assess whether the training was effective. Did it truly improve understanding? Did it change behavior? One way to do this is to implement pre- and post-training quizzes. Assess a learner’s knowledge before the training begins and then again after it’s completed. Compare the two and see if learners gained knowledge. Another way to do this is to analyze all learners’ responses to specific questions to see if a concept is difficult for most learners or if training could be tweaked to help most learners based on their prior responses to certain questions or topics.

IN SUMMARY

Making improvements in your compliance program doesn’t mean you need to move mountains. Follow these five small tweaks for significant improvements in your compliance program. Trust me, with just a little extra effort, you’ll see a big impact.



AUTHOR BIO

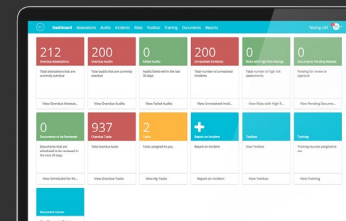
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CJ Wolf is a healthcare professional with more than 20 years of experience in hospital and physician revenue cycle, practice management, compliance, coding, billing, and client services. He has been providing healthcare consulting and solution services to hospitals and physician organizations throughout the country.

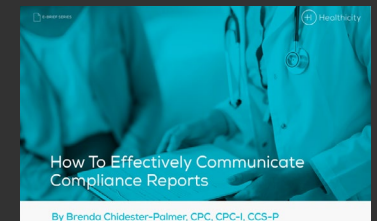
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