

# COMPLIANCE TODAY



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A publication for  
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professionals

A black and white portrait of Alan Yuspeh, a middle-aged man with dark, wavy hair, wearing a dark suit jacket, a white shirt, and a patterned tie. He is smiling slightly and looking directly at the camera.

meet  
Alan Yuspeh

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# Compliance Day and Week

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*HealthCare System (CHS) is comprised of 23 hospitals and health care delivery facilities which are either owned, managed or leased in both North and South Carolina. CHS has approximately 24,000 employees and combined gross patient revenues in excess of \$2.5 billion. It is the largest health care system in the Southeast, and the third largest public, multi-hospital system in the nation. The system also includes a 500-physician provider organization known as Carolinas Physicians Network, which includes approximately 100 health care delivery sites in 11 counties throughout North and South Carolina and a Graduate Medical Education Program at Carolinas Medical Center, which includes rotating internships in 10 specialty areas that consist of 135 faculty physicians and 200 physician residency positions.*

## **Raising the compliance program awareness**

In an effort to enhance the effectiveness of its Compliance Program by raising the awareness of its employees and supporting a culture of compliance, Carolinas HealthCare System (CHS) sponsored the first annual Compliance Awareness Week

## **Learn how Carolinas HealthCare System increases awareness by celebrating compliance**

**By Gene DeLaddy and Cheryl Atkinson**

at its main facility, Carolinas Medical Center, from May 20 - 24, 2002. The remaining CHS facilities will host individual Awareness Weeks throughout the remainder of 2002 and into the first quarter 2003.

As a Chief Compliance Officer, Director of

Compliance or a Compliance staff member, you are very familiar with your facility's Corporate Compliance Program, the seven elements that define an effective program according to the Office of the Inspector General (OIG), and many of the regulations which govern our world of Compliance. But, does your staff know the name of your Compliance Officer or how to contact the HelpLine? If an OIG inspector were to come into your facility for an unannounced audit, would your staff know what to say or do?

As we expand the reach of our compliance programs and strive to increase the effectiveness of our efforts, it is essential for us to make sure that all staff are educated on the basic elements of our program and that the principles of compliance are a part of our culture.

How can you raise the awareness of your compliance program across all staff levels? One way is to require that all staff review a mandatory education module and successfully complete a post test each year. But, can you count on staff truly

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learning all of the material presented in that module, or will their knowledge of compliance be limited to the questions asked on the test?

Combined with this annual education requirement, the concept of a Compliance Awareness Week can be implemented to provide additional and personalized education to staff and help to reinforce the facility's commitment to a culture of compliance. The concept of a Compliance Awareness Week should include elements such as "Meet and Greet" sessions for Compliance staff to introduce themselves to employees, display boards that describe the elements of your compliance program, games that reinforce key questions of compliance knowledge and other attendance-boosting activities such as prize giveaways. But, how do you get started?

### Planning the "meet and greet" sessions

The first thing to be done in planning such an event is to work with your facility's Administration to select a week during which there are no other major events taking place. Some facilities may also wish to work with their Marketing and/or Medical Staff Services departments, since these groups typically plan and schedule any facility-sponsored awareness or appreciation weeks.

Once you have chosen a week that works for the facility's calendar and the schedules of all relevant Compliance and Administrative staff, it is then important to choose several different time blocks across all shifts for the "Meet and Greet" sessions. An example of these blocks may be from 11:00 am to 1:00 pm, 6:00 pm to 8:00 pm, and 11:00 pm to mid-

night. Key members of a facility's Administrative team should then be available at one or all of these blocks to introduce themselves to staff, answer questions the staff may have about compliance or about the facility's commitment to compliance. This includes the Compliance Officer, the President/CEO, VP of Nursing and leadership from Human Resources, Medical Records and Patient Accounting.

Once you have confirmed the dates and schedule for your Awareness event, it is critical to advertise as early and as much as possible across your facility. Submitting an article to your facility's hospital-wide newsletter approximately one month in advance is a way to get the word out. You may also wish to distribute a flyer to each department or to each employee (depending on the number of employees within your facility) and announce the event at any department head or medical staff meeting so that employees have plenty of notice prior to the event.

These "Meet and Greet" sessions should be set up in a location that is accessible by all staff, i.e. cafeteria, large classroom. It should also contain several educational displays which define the key elements of your compliance program, such as a listing and definitions of your Compliance Policies, an overview of when to use the HelpLine (Compliance issues) and an overview of when to contact your Human Resources department (Human Resource issues) for assistance.

A facility should also reference the guidance provided by the OIG (Federal Register, Vol. 63, No. 35, pgs 8987-8998, February 23, 1998) that defines

the minimum elements which should be included in a hospital's compliance program. These elements should be presented on the display boards in a format which highlights the effectiveness of your program by comparing the OIG's guidance to the elements that have already been implemented in your compliance program. You can also use these displays to provide some basic education on coding and documentation requirements, business courtesies and gifts guidelines (i.e. What are some examples of acceptable gifts? What is your facility's definition of "nominal value"?), guidelines for dealing with visits from Government Officials, and HIPAA standards.

It is also important to have an Attendance Sheet located at the "Meet and Greet" sessions so that departments can be recognized for having representation at the compliance "education moments" that will be provided to staff. A sign-in sheet will also allow you to encourage competition among departments for the highest attendance rate (calculated as the percentage of a particular department's staff who attend the event) and to award a prize to the winning department.

### Prize giveaways and education moments

In addition to the prize(s), which can be awarded to the department with the highest attendance rate, a facility can also develop games through which compliance staff can test the knowledge of your employees regarding several key points. One example is to have a card with questions listed on it from which the compliance or administrative staff can have a question and answer session with any staff who visit the session. Several exam-

ples of questions you may wish to use are listed below:

- Who is the Chief Compliance Officer?
- What is his/her phone number?
- What is the HelpLine number?
- As an employee, are you responsible for reporting suspected misconduct?
- Describe an example of misconduct you would report to either the Compliance Department or to the HelpLine.

If an employee can not answer the questions correctly, your staff should then take the opportunity to explain the correct answers and answer any additional questions while he or she is visiting with that particular employee. Of course, it is then a good idea to give away one of the prizes (key chain, button, pen, etc.) to the employee to reward him or her for participating in that "education moment".

#### Judging the success of your event

Once the event has concluded and the prizes have all been given out, how do you know if it was successful? Is there a specific attendance percentage for all employees that you should have met? Can you be sure that you made a difference in the awareness levels of your employees about Corporate Compliance?

If this is the first year in which your facility has hosted a Compliance Awareness event, then it is difficult to determine an answer to any of these questions. There is no published benchmark for measuring attendance rates at events such as this. In addition, many of your employees may not be able to make it to the event based on schedule conflicts (meetings), patient needs or logistical chal-

lenges (employees in a hospital-owned physician practice might not be able to get to the main campus). It is too difficult to take these possibilities into consideration when setting a target attendance rate.

In absence of any pre-determined measure of success, there are several different methods by which you can gauge the value that your awareness efforts have brought to your facility's compliance program. Soliciting feedback from employees or from members of Administration is critical to understanding which things went well and which things might need to be different the following year. The Compliance department should also monitor the volume of HelpLine and non-HelpLine calls (i.e. direct calls or emails into the department during which an employee requests guidance on a compliance policy or potential issue) that your facility experiences before and after the event to help "measure" the extent to which your employees are more aware of your department and/or your Compliance Officer. In addition, a facility should create and distribute an Awareness Survey to a random sample of employees to evaluate their awareness levels regarding your compliance program, to measure the reach of your compliance awareness event and to solicit feedback

regarding any potential compliance issues at the facility. Employees should be allowed to anonymously complete and submit the survey to your department to encourage honest feedback; however, you should encourage the employees to include their department and/or facility name so that you are able to deal with any trends or issues that can be detected across the responses.

In the subsequent years, a facility should measure statistics such as changes in attendance rates and survey responses to determine the difference in attendance over years and if any specific departments need to encourage their staff to attend future events or to provide focused education about compliance.

Overall, the concept of a "Compliance Awareness Week" is something new that a facility can implement to expand the awareness of its compliance program to all employees and to spend a moment focusing on the positive things that Compliance does for the facility. As we continue in our role as a Compliance Officer, Director of Compliance, or a Compliance staff member, we should strive to add value through new programs such as holding a Compliance Awareness Week and to continually support a culture of compliance. ■



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