



Developing a Targeted and Effective Compliance Work Plan

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Objectives

Review:

- Development
- Structure
- Presentation
- Maintenance
- Follow-up

Development

- Be proactive – don't wait for issues to come to you.
- Know your resources:
 - People are your best resource in identifying targeted risk areas
 - Meet with leadership and other stakeholders prior to development – what are they seeing?
 - Share suggested topics
 - OIG work plan – published monthly
 - Industry trends:
 - RAC Monitor
 - AHIMA
 - AAPC

Development...cont.

- Narrow down topics by risk
 - Topic from the OIG Work plan and those with known errors have highest weight
- Consider the number of hours it will take to complete the topic
- Consider the resources available to complete the topics
- Determine organizational priorities (strategic pillar, mission, vision, etc.)
- Overarching goals:
 - Risk prevention
 - Risk reduction
 - Managing identified risk

Structure

Show the value in a snapshot:

Element	Topic	Focus	Source	Update	Risk Rating	Responsible Person	Citation(s)	Proposed Start Date	Due Date	% Complete	Start Date	Completed Date	Work Product
General Compliance Initiatives													
7	Offering Little Ceaser's Pizza at the Bistro	Survey employees for interest and report back to the board - make sure they are hungry!	Internal	Completed review and implemented daily delivery.	Low	Mary	42 CFR 888.88	Q2	Q3	100%	5/1/2019	7/26/2019	Memo to stakeholders

Structure - Element

- Seven elements of an effective Compliance Program:
 1. Implementing written policies, procedures and standards of conduct
 2. Designating a compliance officer and compliance committee
 - 3. Conducting effective training and education**
 4. Developing effective lines of communication
 5. Enforcing standards through well-publicized disciplinary guidelines
 - 6. Conducting internal monitoring and auditing**
 7. Responding promptly to detected offenses and developing corrective action

Structure - Topic & Focus

- Topic – High level topic description
 - Does not need to be detailed – use the same name for reports, memo, etc. for documentation and file name consistency
- Focus:
 - What do you intend to elicit from the audit results?
 - Is this a re-audit?
 - How does this support the organizational/department goals?

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Structure - Source, update, etc...

- Provide comprehensive high-level updates
- Give a timeline for completion –these should be flexible
- Provide the expected work product

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Presentation

- Who are your stakeholders?
 - Consider your audience
 - Executive Compliance Committee
 - Corporate Compliance Committee
- What detail can you provide to ease understanding?
 - Include a brief executive summary for each topic
 - Use universal language and avoid unnecessary or ambiguous acronyms

Maintenance

- Living document
 - Don't be afraid to add or remove items if the situation warrants
 - Be sure to update when you complete items – less opportunity to forget important details
 - Include summary of findings & recommendations provided
 - Amend topics if the OIG work plan has a new related issue (broaden/narrow scope)
 - Seek approval for changes
 - Save a backup copy!

Follow-up – the hard part!

- Compliance is a recommendation focused department
- Often have no control over the operationalizing recommendations – how do we follow-up?
 - Document for each recommendation:
 - Action(s) taken
 - Implementation date
 - No action taken = explain
 - Confirm risk assumed
 - Report
- Let stakeholders know all information is reported to the appropriate Compliance leadership, organizational leadership, and committees
- A compliant organization is a strong organization – it all begins at the top and leaders should be engaged in the process

Thank you!

Comments, questions, thoughts, discussion opportunities?

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