

Importance of Compliance Training

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About Tenet

- 49 Hospitals
- 117 Outpatient Centers
- 64,000 Employees
- 20,000 Contractors
- 16,000 Med. Staff Members



Some Data

- 2 million+ compliance training completions in the past seven years
- 10,000+ live general training classes
- 1,673 calls to our ethics action line in 2012
- 2,941 number of potential compliance issues worked during 2012



Some Annual Training Statistics

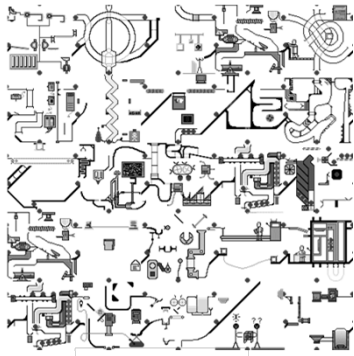
- General Compliance Training
– 99.94% complete of 83,685
- Standards of Conduct Training
– 99.83% complete of 17,772
- Clinical Quality Training
– 99.98% complete of 56,808
- Billing and Coding Training
– 98.7% complete of 3,630
- Focus Arrangements Training
– 100% complete of 1,860

We're lining up to take our annual compliance training



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Our Plan



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Session Objectives

- Training infrastructure
- Goals of annual training sessions
- Scope of training
- Setting the focus of training
- Training methods
- Monitoring training
- Impact training can have on your organization

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What Do You Want To Focus On?

- Mandatory vs. non mandatory
- Topics
- Live vs. online
- Implementing and Tracking
- Outcomes and culture



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Infrastructure- Organizational Commitment

- Compliance Charter Requirements
 - Developing, providing and tracking General Ethics and Compliance Training
 - Two hours of training for new directors, employees, contractors and agents, within 30 days of employment
 - One hour of general refresher training each year thereafter



Infrastructure- Organizational Commitment

- Compliance Charter Requirements
 - Developing, providing and tracking Job-Specific training
 - Two hours of training for new employees, contractors and agents, that provide patient care services or who work in clinical quality, coding, billing, prepare cost reports or work with referral source agreements within 30 days of employment
 - One hour of Job-Specific refresher training each year thereafter



Infrastructure- Organizational Commitment

- Compliance Charter Requirements
 - Developing, providing and tracking :
 - Two hours of annual training on ethics and compliance and clinical quality oversight to the members of each hospital governing board



Infrastructure- Organizational Commitment

- Compliance Charter Requirements
 - Creating and disseminating the company's Standards of Conduct and obtaining certifications of adherence to the Standards as a condition of employment, within 30 days of employment. Any material changes to the Standards should be timely communicated to all employees.



Infrastructure- Organizational Commitment – Mandatory Training

- Well defined policy on training

TENET	Human Resource Policy	No.	HR-411
	ETHICS AND COMPLIANCE TRAINING POLICY	Rev.	1 of 1
		Effective Date:	06-27-11
		Revised Policy Date:	10-07-09
		Previous Version Date:	02-21-05
			07-24-08

I. SCOPE:.....

II. PURPOSE:.....
 The purpose of this policy is to outline the participation requirements for employees in Ethics and Compliance Training as mandated in the Tenet Compliance Program Charter.

III. DEFINITIONS:.....

IV. POLICY:

All Employees and certain other individuals, as may be identified by the Chief Compliance Officer or Regional Compliance Officer (RCCO), must receive Ethics and Compliance Training in accordance with this policy. If an Employee fails to receive any required Ethics and Compliance training within the prescribed time periods outlined in this policy, the Employee may be immediately suspended without pay until such time as he or she receives the required training. This suspension will normally be treated as a formal action under Human Resources Policy HR-400 Employee Performance Management. If the Employee on suspension fails to undergo the required training within 15 calendar days, the RCCO will coordinate with the facility Human Resources Department regarding the appropriate next step in the performance management process, which may include termination of employment.



Infrastructure: Our Goals

....2) further Tenet's goals of establishing an organization that (a) fosters and maintains the highest ethical standards among all Tenet employees, officers and directors, physicians practicing at Tenet facilities and contractors that furnish health care items or services; (b) values its compliance with all state and federal laws and regulations as a foundation of its corporate philosophy; and (c) aligns with Tenet's core values of quality, integrity, service, innovation and transparency.



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Infrastructure: Our Goals

- Delivery of Training
 - Minimum impact on operations
 - Train all employees within calendar year
 - 85% or greater approval of training
 - Weekly reporting of training completions
 - Accurate and timely reporting of training exceptions
 - 99.5% or greater overall training completion rate



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**Keep A Consistent Theme
We Still Define Compliance in Eight Key Areas**

- Healthcare is compliant when it is:

Is Documented, Charged and Billed Correctly		
Is Provided in an Approved Facility	Promotes Patient Rights	Is Reimbursed Correctly
Is Provided Without Financial Incentives		
Is Medically Necessary	Is Provided by Qualified Physicians/Staff	
Meets Quality Standards		





Summary of Scope of Training

- Charter Requirements
 - General training Employee, Directors, Contractors, Governing Hospital Board Members
 - Job-Specific
 - Billing and Reimbursement
 - Arrangements
 - Clinical Quality
 - Excepted Physicians
 - Physicians
 - Standards of Conduct Certifications
- Other Compliance Related Training
 - Information Privacy and Security, Red Flags, HITECH
 - Clinical Research
 - EMTALA
 - ICD-10 Implementation
 - Other items within Tenet's eight key areas of compliance or Hot Topics

Setting the Focus of Training

- General Compliance and Ethics (New and Refresher)
 - Intertwine ethical decision making into all training topics
 - Identify the top 5 compliance issues to be covered based on
 - Hot-line calls
 - New key policy initiatives
 - Investigations
 - Audits
 - Consultants
 - Hot/New regulatory topics

Examples:
 Photos of patients
 Sexual Misconduct
 Discharge errors
 Level of care-Case Management
 Drug company perks
 Budget
 Documentation
 Physician Arrangements

Setting the Focus of Training

- Job-Specific Training – Arrangements (New and Refresher)
 - Collaborate with Legal or outside counsel
 - Identify the major issues impacting arrangements with referral sources
 - OIG Investigations
 - Legal challenges
 - Regulatory updates
 - Revision to standard agreements
 - OIG Fraud Alerts

Specific Examples:
Supporting documentation
Non-monetary compensation
Intent of agreement
Market value of compensation
Contract management
Collection efforts



Setting the Focus of Training

- Job-Specific Training – Billing and Reimbursement (New and Refresher)
 - Collaborate with billing staff
 - Identify the major issues impacting claims processing and reimbursement
 - Claim denials
 - Request of records
 - Medicare Transmittals
 - Medical billing audits

Specific Examples:
Incorrect use of modifier
Bundled charges
Late charges
Re-billed claims
Appeals and denials



Setting the Focus of Training

- Job-Specific Training – Cost Reporting (New and Refresher)
 - Collaborate with Chief Financial Officer
 - Identify the major issues impacting the filing and audit of cost reports
 - Medicare Audit Adjustments
 - Changes to Dispro rules
 - Graduate Medical Education
 - Medical billing audits

Work with CFO and Auditors to determine current topics of importance. Consider offering CPE for training



Setting the Focus of Training

- Job-Specific Training – Governing Board Members (New and Refresher)
 - Collaborate with leadership team
 - Identify the major issues facing the Board
 - Quality of care initiatives
 - Medical Staff Oversight
 - Regulatory changes
 - Key compliance issues

Examples:
Physician credentialing and re-credentialing
Peer Review process
Medical staff applications
Oversight of quality of care
Support understanding of fiduciary responsibilities



Setting the Focus of Training

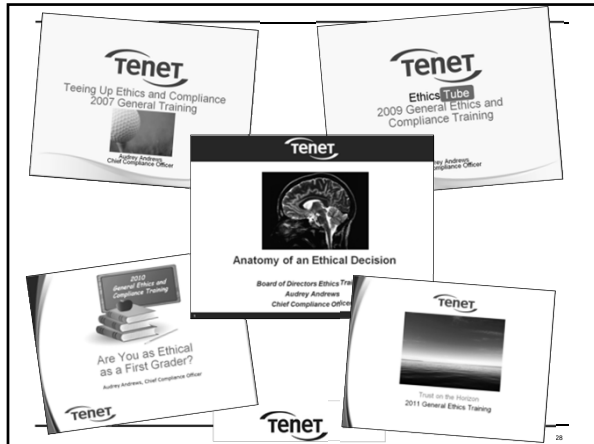
- Job-Specific Training – Medical Staff Physicians (New and Refresher)
 - Make all training available to Medical Staff members including Allied Health Professional
 - Making Governing Board training available can assist with physician buy-in to quality initiatives.
 - Offer CME credit for participation

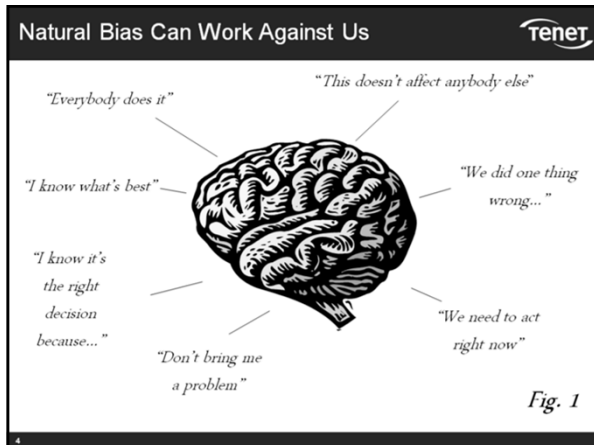


Training Methods

- General Training
 - Live sessions offer the best learning opportunity. Design sessions that allow of active participation by the attendees
 - Live sessions should include senior management, no special session for leadership







Training Methods


- Job-Specific Training
 - Computer-based training enables:
 - Coverage of job specific materials
 - Testing for comprehension
 - Offering of several course to meet the training requirement
 - Different learning formats
 - lecture
 - Interactive
 - video



Training Methods

- Streaming Video
 - Easier then you might think:


Sample Video



Training Methods

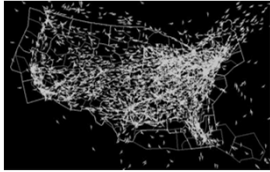
- Live and Taped Web-Based Session
 - Easier then you might think:

Sample



Set Your Plan Up for Rollout And Tracking

- Think air traffic control
- Automation is key
- Consider Annual Report reporting requirements
 - Listing of Relevant Covered Persons
 - Schedule of Training Sessions
 - Number of individuals required to be trained, percentage of individuals actually trained
 - Number of individuals required to complete the Code of Conduct certification, percentage of individuals who completed



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Learning Management System Offers

- Automated Assignments
- Electronic Certifications
- Email notifications
- Permanent transcripts
- Reports

Payroll System

Contractor System

Learning Management System

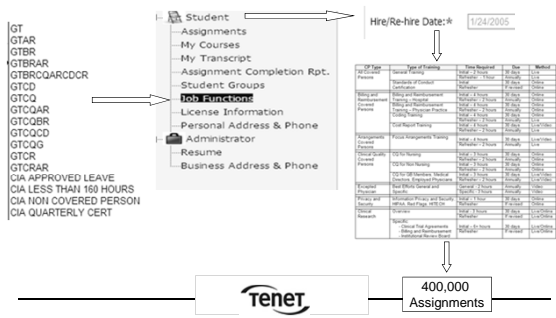
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Education Reports

- Assignment Completion - Drill Through
- Assignment Completion - Schedule
- Class Contacts
- Class Grading Status by Administrator
- Class Grading Status by Course
- Class Registration Status
- Roller and Sign-in Sheet
- Session Data Report
- Use Certificates
- Use Completion - Drill Through
- Use Completion - Schedule
- Users/Wait Due - Drill Through
- Users/Wait Due - Schedule
- Users/Assignment Completion
- Users/Course Completion
- Users/Scores by Course
- Users/Scores by Course
- Users/Class Schedule
- No Show
- Student Course Completion Extract
- Test Question Analysis
- Top 10 Completions
- Upcoming Classes

How The Whole Thing Works

- Line of Business + Job-Specific Training code + hire date = training assignment (or not)



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