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PROVIDER COMPLIANCE TRAINING

TAKE THE INITIATIVE.

Cultivate a Culture of Compliance With Health Care Laws

A Toolkit for Health Care Boards

Promote Quality of Care

- Create a comprehensive policy and objectives to define your quality improvement and patient safety program. Ensure your stakeholders share a common vision of quality. To give your program real impact, incorporate its objectives into employee performance evaluations and incentive compensation.
- Establish a board quality committee and make quality of care a standing board agenda item.
- Ensure you have sufficient clinical expertise on the board. To address potential conflicts, some hospital boards recruit physicians who are not medical staff members, or who are retired.
- Understand how management assesses the credentials of the medical staff and stay current on best practices.
- Implement conflict-of-interest policies to identify and manage financial interests that may affect clinical judgment.
- Use dashboards and benchmarks to measure the success of your organization as it improves outcomes and patient satisfaction. You should track how your organization compares to its peers on these quality indicators. After all, "What gets measured is what gets done."

Evaluate the Compliance Program

- Ask questions that assess your compliance program. If a business unit is lagging, invite the managers to discuss their strategy for improvement. Our website offers resources that can help at http://www.oig.hhs.gov/compliance/compliance-guidance/compliance-resource-material.asp.
- Protect the compliance officer's independence by separating this role from your legal counsel and senior management. All decisions affecting the compliance officer's employment or limiting the scope of the compliance program should require prior board approval. If your compliance officer leaves, the audit committee should conduct an exit interview.
- Learn how quality, patient safety and compliance information flows to the board. Educate the board on the structure of the compliance program, and the organization's fraud and abuse risk areas. Publicize training so employees know the board considers compliance a priority.
- Ensure that your organization can validate the accuracy of its quality data. Federal program reimbursement is tied to quality of care. Accurate data is critical. Concealing unfavorable information or failing to investigate significant inconsistencies not only undercuts your quality improvement program; it can lead to criminal and civil liability.
- Talk to employees to learn how they see the organization's values and culture of compliance. Personal appearances by board members at staff meetings demonstrate a top-down commitment to quality and compliance.
- Perform regular self-assessments of your board and its committees. Evaluate the composition of your compliance, quality committees. Review the board's responses to systemic failures and lapses in patient care.



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