

HOW MANY BALLS CAN YOU JUGGLE?

Issues Relating to Integrating Compliance Practices for Multiple Entities

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JOEL D. DZIENGELEWSKI
Kaiser Foundation Health Plan, Inc.

ROBERT CHING
Hawai'i Pacific Health



LEARNING OBJECTIVES

- **Overview of those factors which will impact your ability to juggle any balls and, therefore, your ability to integrate compliance practices**
- **Overview of potential strategies to address and overcome those factors**



AGENDA

- **Background information**
- **Factors impacting integration of compliance practices**
- **Strategies to integrate compliance practices**



BACKGROUND INFORMATION

- **Size of your organization**
- **Multiple locations**
- **Recently acquired or acquired another**
- **Length of experience in your job**



INVITATION TO JUGGLE

- **Industry economics**
- **Efficiencies and synergies**



TYPES OF INTEGRATION ISSUES

- **Corporate organization issues**
 - size and nature of the integrated entity
- **Compliance leadership issues**
 - accountability and structure
- **Strategic planning issues**
 - federal sentencing guideline elements
- **Technology issues**
 - IT capabilities and practices



CORPORATE ORGANIZATION ISSUES

- **Corporate dynamics**
 - number of employees and physicians
 - geographic dispersion
 - resources
 - labor vs non-labor

- **Strategic planning issues**
 - corporate culture
 - legal parameters
 - financial considerations



COMPLIANCE LEADERSHIP ISSUES

- **Compliance program history**
 - executive leadership commitment
 - compliance organization
 - compliance history
- **Compliance accountabilities**
 - business practice model
- **Compliance issues**
 - beyond fire drills
 - risk analysis



STRATEGIC PLANNING ISSUES

- **Compliance program elements**

- **compliance program**
- **code of conduct**
- **compliance committee**
- **compliance training**
- **confidential disclosure program/hotlines**
- **screening of ineligible individuals**



TECHNOLOGY ISSUES

- **IT capabilities and practices**
 - IT solution potential
 - integration into practice
- **Integrating multiple systems**
 - billing, coding, and CDMs
 - common platforms
 - inefficiencies of scale



DETERMINING WHICH BALLS TO JUGGLE

“BOWLING BALLS” vs. “RUBBER BALLS”

- **Due diligence process**
- **Corporate integrity agreements**
- **Corporate imperatives**



STRATEGIES FOR INTEGRATION

- **Determining the size of bowling balls**
 - prioritize by risk
 - resource limitations
 - picking your battles
- **Juggling bowling balls**
 - assumption of efficiencies
 - consolidation vs. effectiveness
 - experience



ONE POSSIBLE AVENUE TO SUCCESS . . .

- A framework that promotes the establishment of a system
- A cohesive comprehensive plan that will support the development and continuity of a system

EVOLUTION TO A COMPLIANCE SYSTEM

Infrastructure Development

Code of Conduct

Conflict of Interest Survey

Compliance Hotline

General Compliance Training

Policies

Procedures

Set Operations Accountabilities

Risk Assessment / Monitoring

Specialized Training

7 Element Development

Completion Will Be Largely Dependent On COMPLIANCE Personnel

Completion Will Be Heavily Dependent On OPERATIONS Personnel





SEVEN ELEMENT MODEL PROVIDES FRAMEWORK

- Code of conduct
- Compliance help line
- Compliance processes - conflict of interest, etc.
- General compliance training
- Policies & procedures
- *Risk assessment - AND - Corrective actions*
- *Specialized Training*

*Rinse & RepeatIt Never Ends.....It Becomes
Embedded.....It Becomes Less REACTIVE*



FACTORS AFFECTING PLAN DEVELOPMENT

EXPERIENCES FROM THE FRONT LINE

- **Corporate organization issues**
 - size and nature of the integrated entity
- **Compliance leadership issues**
 - accountability and structure
- **Strategic planning issues**
 - federal sentencing guideline elements
- **Technology issues**
 - IT capabilities and practices, functional vs compliance

FACTORS AFFECTING PLAN DEVELOPMENT

REACTIVE

=

REPAYMENT

REPARATION

REPUTATION

OR

PROACTIVE

=

PROGRESS

PROTECTION

PROMINENCE

CONCLUSION

QUESTIONS

