



CORPORATE RESPONSIBILITY TRAINING

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The Sixth Annual National Congress on Health Care Compliance
Session 4.04, Developing Training and Employee Tracking Procedures
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WHY

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- ❁ **OIG Compliance Guidelines**
- ❁ **Hospital's Corporate Responsibility Plan**
- ❁ **Personal invitation from the Dept.of Justice and the OIG**
- ❁ **Effectively communicate standards & expectations**
- ❁ **Delegate compliance accountability and reporting**

Education Requirements

- Each officer, director and employee shall receive at least one hour of initial training
- Such training will be included in the formal orientation of all new employees
- 4 hours of annual training for all employees involved in preparing or submitting Medicare bills
- Documentation of all education to include: Date, Time, Outline/Handouts, Attendance Records.

Initial Training & New Employee Orientation

- **Ethics/Values & Corporate Responsibility program developed . Mandatory session for every employee, director...**
- **The Ethics, Values & Corporate Responsibility Education is included in the formal new employee orientation.**



4 Hour Training Sessions:

- Hire outside consultants

- Advantages

- Fast & easy
- Provided good training tools
- Provided the basic structure for developing future training programs
- Knowledgeable about the subject matter
- Demonstrated the hospital's commitment

Disadvantages

- Expensive
- Education was provided in 3 sessions, each session was 3 to 4 hours
 - Operational Applications
 - Reporting Applications
 - Corporate Applications
- Some employees had to attend more than 1 session

4 Hours Education:

• In-house Program

- Took the education into the specific departments
- Inter-active: employees asked to describe how they complied with standards and regulations
- Encouraged staff to offer suggestions to improve procedures & processes
- Free to ask questions and/or express concerns
- Re-enforce reporting mechanisms

Topics - Finance

- Duplicate Billing
- 3 Day Rule
- Bundling/Unbundling
- Billing for services not rendered
- Credit Balances
- Bad Debt: Charity, Waivers, Collections
- Cost Report
- Medicare Secondary Payor



Topics: Laws/Regulations

- Stark II
- Anti-kickbacks
- Antitrust
- Tax Exempt Status
- Excluded Provider
- EMTALA



Topics: Clinical

- **Medical Necessity**
- **Hospital Issued Denials**
- **Advance Beneficiary Notices**
- **Patient Freedom of Choice**

Education - Other

- Local CMS Seminars
- PRO Seminars
- Find out what other seminars employees are attending.
- Create a data base to capture these educational sessions



Education: Other

- **OLG Alerts: Send them out with a sign-off tracking form and create a log**
- **Take advantage of in-house newsletters and publications**



New Education Plan: Web based training

- **Starting this month**
- **All managers will take 2 courses on basic Fraud and Abuse**
- **Expand to all employees**
- **Specific modules for various job codes and departments**