Operating an Effective Compliance Program

- Policies and Procedures
  - Regularly review and update with department managers and Compliance Committee.
  - Assess whether they are tailored to the intended audience and their job functions.
  - Ensure they are written clearly.
  - Include "real-life" examples.

- Measuring Effectiveness
  - Develop compliance program with benchmarks and measurable goals.
  - Set up a system to measure how well you are meeting those goals.
  - Involve the Board in creating the program and regularly update the Board regarding compliance risks, audits, and investigations.
  - If one or more goals are not met, investigate why and how to improve in the future.
  - Assess whether the compliance program has sufficient funding and support.

- Training
  - Regularly review and update training programs. Try different approaches. Use "real-life" examples.
  - Make training completion a job requirement.
  - Test employees' understanding of training topics.
  - Maintain documentation to show which employees received training.
  - Train the Board.
  - Train yourself and your compliance staff. Attend conferences and webinars, subscribe to publications and OIG's email list, monitor OIG's website, and network with peers to stay up-to-date and get ideas.

- Lines of Communication
  - Have open lines of communication between you and employees.
  - Maintain an anonymous "hotline" to report issues to you.
  - Enforce a non-retaliation policy for employees who report potential problems.
  - Establish a direct line of communication between you and the Board.
  - Use surveys or other tools to get feedback on training and on the compliance program.
  - Use newsletters or internal websites to maintain visibility with employees.
  - Regularly meet with the Board and brief them on the compliance program.

- Internal Auditing
  - Perform proactive reviews in coding, contracts & quality of care.
  - Create an audit plan and re-evaluate it regularly.
  - Identify your organization's risk areas. Use your networking and compliance resources to get ideas and see what others are doing.
  - Don't only focus on the money – also evaluate what caused the problem.
  - Create corrective action plans to fix the problem.
  - Refer to sampling techniques in OIG's Self Disclosure Protocol and in CIAs to get ideas.

- Enforcement of Policies and Procedures and Prompt Response to Compliance Issues
  - Delegate/empower teams closest to the issues to perform reviews, but be careful of possible conflicts or personal relationships that may interfere with getting an objective review.
  - Act promptly, and take appropriate corrective action.
  - Create a system or process to track resolution of complaints.
  - Enforce your policies consistently through appropriate disciplinary action.