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HEALTH CARE  
COMPLIANCE  
ASSOCIATION

# COMPLIANCE TODAY

Volume Ten  
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**Earn CEU credit**

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**Outpatient therapy services: Medicare's trap for the unwary**

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**Paula J. Desio**

Chair for Ethics Policy, Ethics Resource Center

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# Letter from the CEO

## Ideas for your Compliance and Ethics Program

Joe Murphy is writing a book that I think is quite interesting and effective. The title of his book will be 310, no, it's 345, no, wait, it's 368, no make that, "401 Ideas for your Compliance and Ethics Program". Actually we don't know how many ideas there will be when this is final because Joe is increasing the count on an hourly basis. I will be a co-author on the book, but I have to admit Joe is very hard to keep up with. Not only is he developing these short pearls of wisdom, but he is referencing the ideas to the document, article, book, etc. that generated the idea. That way, readers can follow up and get more information. Joe is already planning on following up with a second edition as soon as the first one comes out. Some of the compliance ideas will be accompanied by photos or illustrations.

The book is intended to be an easy read, inexpensive, and a refreshing way to get ideas for your compliance program. No analysis, no ponderous opinions, no rules you have to follow – just ideas and tips you can use or toss. It will surely be a much appreciated break from the arduous, lengthy, and sometimes dry compliance publications and regulations we all must sift through. It will be helpful to everyone in the Compliance department because it will cover all elements of compliance, such as education, auditing, monitoring, codes of conduct, discipline, etc.

### Win a free registration to a Compliance Academy

If you are interested in sending Joe an idea for the book, please forward it to him for his consideration ([jemurphy@cslg.com](mailto:jemurphy@cslg.com)). He is very interested in your ideas and if he uses them, he will include your name along with your compliance idea in the book (unless you want to remain anonymous). Be sure to add a reference if you have one, such as an article or page in a book where the idea was explained or applied. We will take all of the ideas Joe gets prior to publication and randomly select one. That person will receive a complementary registration to one of SCCE's or HCCA's Compliance Academies. (All other expenses must be covered by the recipient.) If you send 10 ideas you will have 10 chances to win.

If you would like to be notified when the publication is available, please send an e-mail asking to be notified about the release of the Compliance Ideas book to [nancy.gordon@corporatecompliance.org](mailto:nancy.gordon@corporatecompliance.org). Here are a few examples from this upcoming book.



ROY SNELL



9. **Test comprehension.** Test the reading comprehension level of the code.



30. **Prevention consultants.** Have compliance and ethics professionals review new business proposals and operations to analyze where problems could occur and where control weaknesses might exist, and recommend controls tailored to the potential risks. See Roach & Davis, "Establishing a Culture of Ethics And Integrity in Government," 21 ethikos 1, 16 (Sept./Oct. 2007).



12. **Mail to homes.** Consider mailing the code to employees' homes. See Singer, "Bracing for Deregulation, AEP Boosts Ethics Training," 11 ethikos 1, 2 (July/Aug. 1997).



24. **HR manual.** If there is a separate HR or personnel policy, review this and ensure consistency with the code and the compliance and ethics program. ■