Managing an Effective Compliance Program in a Rural or Small Provider Setting

Teri Price, RN, CHC, Compliance Officer
Eastern Band of Cherokee Indians

Debbie Troklus, CHC, CCEP, Compliance Officer
University of Louisville HSC

A Small Rural Setting: Eastern Band of Cherokee

- Cherokee Indian Hospital
  - Indian Health Service—638 Compacted Facility
  - 25 Bed Inpatient Unit, ER, Outpatient Dept., Lab, Radiology, Pharmacy, Dental Clinic

- Health/Medical Division (Public Health)
  - Behavioral Health, Cherokee Diabetes, Community Health, Qualla Youth Health Center, Third Party Billing, Tsali Care Nursing Home, Women’s Wellness Center, WIC, Home Health, etc

- Cherokee EMS
Compliance Realizations for the Small or Rural Provider

- No Staff assistance – You are alone
- Must handle all types of compliance-related issues
- Need for auditing and monitoring varied small healthcare segments
- Wears many hats
- HIPAA is included in the CO duties
- Outside assistance can be important
- Community participation is important
Issues to Consider

- Everyone knows everyone (HIPAA concern)
- “That’s the way we have always done it” (reluctant to change)
- “We are small, it doesn’t matter” (getting them to see the relevance)
- Culture and heritage (it’s a different world)
- Limited resources (both financial and staffing)
- Independence (auditing and monitoring)

The Compliance Officer wears many hats: Which hat am I wearing today?
Effective management of “many hats”

- Understand the culture, know the people
- Utilize effective communication techniques
- Conduct HIPAA privacy training and use specific examples
- Share settlements and stories of enforcement initiatives in your area
- Set a realistic budget and be creative in planning annual activities
- Utilize outside assistance to maintain independence

Effective Management, cont’d

- Set realistic goals and schedules.
- Allow flexibility.
- Designate a back-up.
- Compliance Manual with compliance policies and procedures is up-to-date and easily accessible.
- Delegate and/or defer non-compliance issues to appropriate personnel.
Daily Operations

- Keep a log of daily activities/issues and CO response.
- Utilize resources such as HCCA site, OIG guidance, etc.
- Include compliance updates to staff via email or by company newsletters.
- Build relationships with staff.
- Build a network of compliance professionals in your area.

Although we are “small”, we must have an “effective” program!
The Definition of Effectiveness

“producing a decided, decisive, or desired effect… capable of producing a result.”

“ready for service or action.”

Webster’s Dictionary

What is an effective Compliance Program?

- Addressing all of the 7 elements
- Communicating effectively
- Assessing risk and prioritizing action to be taken
- Consistent discipline
- Monitoring for excluded providers
- Effective policies and procedures
- Education of all staff
- Having buy-in and commitment from the top
Obtaining buy-in and commitment from providers

- Identify a champion
- Involve providers on committees and work groups
- Provide one-on-one education and feedback
- Understand the business and clinical sides of any issue
- Listen

There will always be many hats, finding just the right one is important.
Tools

- Policies and Procedures
- Audit Templates