HEALTH CARE COMPLIANCE EDUCATION: MEETING THE CHALLENGES

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AGENDA

- REASONS FOR THE PROGRAM
- THE SETTING
- THE UNIVERSITY-BASED HEALTH CARE COMPLIANCE CERTIFICATE
- HCCB ACCREDIATION
- THE FUTURE
REASONS FOR A UNIVERSITY-BASED EDUCATION

- No Formal University-Based Education
- Many Entries into the Profession
- Increased Visibility and Professional Demands
- Increased Scrutiny by Federal Government
- Job Growth
- Preparation for HCCB Certification Exam
- Minimize “Indoctrination by Fire.”
33. His/her management level could be best described as:

- Middle management, 29%
- Part of the senior management team, 50%
- Supervisor, 1%
- Individual Contributor, 1%
- Officer of the company, 19%
35. What is the Compliance Officer’s tenure in their present role?
Chief Compliance Officer: Most public companies are just starting to implement programs to meet and exceed the requirement of Sarbanes-Oxley and corporate reform. The CCO oversees the corporate compliance program, functioning as an independent and objective body that reviews and evaluates compliance issues/concerns within the organization. The position ensures that the board of directors, management and employees are in compliance with regulatory agencies and corporate policies.
THE SETTING: QUINNIPIAC UNIVERSITY
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- SCHOOL OF BUSINESS
  - MHA DEGREE
  - MBA DEGREE

- SCHOOL OF LAW

- HEALTH LAW CERTIFICATE
67. The primary industry experience that you deem most important in a CCO is:

2004
1. Health Care Administration
2. Attorney
3. Auditor
4. Health Care Consulting
5. Government
6. Physician Executive
7. Human Resources
8. Other Health Care Licensed Professional
9. Manufacturing
THE HEALTH CARE COMPLIANCE CERTIFICATE PROGRAM

- MISSION STATEMENT:

- The Quinnipiac University Health Care Compliance Certificate Program will provide qualified students with a sound academic foundation and the skills for practical implementation required to function as competent and knowledgeable health care compliance professionals.
THE HEALTH CARE COMPLIANCE CERTIFICATE PROGRAM

VALUES:

- We are committed to raising the level of professionalism for those seeking careers as health care compliance professionals.
- We will serve the diverse educational needs of students in the School of Law, the School of Business and qualified members of the community at large.
- We will provide training that is broad enough to prepare students for compliance careers in all areas of the health care industry.
- We are committed to mutually beneficial collaboration with members of the health care industry to keep the program relevant to the industry’s changing compliance needs.
- We will train compliance officers with the highest levels of personal integrity and competence.
- We pledge to be honest, fair, respectful, and responsible in our interactions with our students and with members of the health care industry.
- We value diversity in people and in ideas.
THE HEALTH CARE COMPLIANCE CERTIFICATE PROGRAM

LEARNING GOALS:

- **Personal and Professional Development**
  - Formulating an individualized career plan and developing the personal characteristics and professional skills required to serve as a leader in the health care industry.

- **Expertise in Health Care Compliance**
  - Acquiring an in-depth understanding of the compliance profession including managerial concepts, auditing principles, and legal knowledge and the ability to apply that knowledge in all health care organizations.

- **Administrative Integration**
  - Developing an understanding of the multiple disciplines involved in corporate compliance and developing the ability to communicate with each discipline, integrating information from each of them into a coherent overview.

- **Decision Making**
  - Developing the ability to make well reasoned recommendations concerning compliance issues based on available information.
THE HEALTH CARE COMPLIANCE CERTIFICATE PROGRAM

LEARNING GOALS:

- **Communication**
  - Learning to use both oral and written communication to manage and mitigate potential compliance issues, serve as a member of an executive team, and effectively educate management and staff about corporate compliance issues.

- **Teamwork**
  - Developing the skills required to effectively function as a member of a health care organization.

- **Ethical reasoning**
  - Learning to identify ethical issues related to business practices, learning to deal with the complexity and ambiguity of those issues, and learning to apply decision-making principles to formulate an ethically justifiable solution.

- **Enhance Compliance as a Profession**
  - Providing an accepted standard of requisite knowledge respected by the health care field and preparing students for successful completion of the Certified in Health Care Compliance examination.
THE HEALTH CARE COMPLIANCE CERTIFICATE PROGRAM

- OBJECTIVES:
  1. have a in-depth understanding of the function of a health care corporate compliance program;
  2. know the elements in the development, management, monitoring, evaluation and enhancement of a compliance program;
  3. understand the compliance officer function, established roles, duties and responsibilities;
THE HEALTH CARE COMPLIANCE CERTIFICATE PROGRAM

- OBJECTIVES:
  4. display a high degree of professional integrity;
  5. have developed oral and written communication skills;
  6. exhibit a sound knowledge of management principles and the ability to translate this expertise into an effective compliance program;
THE HEALTH CARE COMPLIANCE CERTIFICATE PROGRAM

- OBJECTIVES:
  7. comprehend basic auditing techniques and their application to the compliance field;
  8. be able to prioritize areas for focus in their organization based on legal knowledge;
  9. know how to educate and motivate employees to integrate sound compliance procedures into their areas including accuracy of record keeping, conflicts of interest, duty to report, business ethics, billing and coding integrity, and protection of assets;
THE HEALTH CARE COMPLIANCE CERTIFICATE PROGRAM

- OBJECTIVES:
  10. interpret the elements of the False Claims Act, Anti-Kickback Statute, Stark Law and other applicable laws and their application to the health care industry;
  11. have an understanding of Corporate Integrity Agreements and recent litigation in this area;
  12. comprehend OIG sanction screening standards for hiring new employees, giving staff privileges to physicians and other health care professionals and vendor agreements;
  13. successfully complete the Certified in Health Care Compliance examination.
THE HEALTH CARE COMPLIANCE CERTIFICATE PROGRAM

- 16 CREDITS
- 3 Credits: COMPLIANCE CORE COURSE
- 6 Credits: General Management Principles
- 4 Credits: Legal
- 3 Credits: Financial Auditing
HEALTH CARE COMPLIANCE CERTIFICATE: THE COURSES

- CORE COMPLIANCE COURSE
- ORGANIZATION AND MANAGEMENT OF A COMPLIANCE PROGRAM
  - ROLE OF THE COMPLIANCE OFFICER
  - THE SEVEN ESSENTIAL ELEMENTS
  - MONITORING AND AUDITING
- LEGAL ISSUES IN CORPORATE COMPLIANCE
  - Sarbanes-Oxley
  - FRAUD AND ABUSE LAWS
  - IRB’S
  - HIPAA
HEALTH CARE COMPLIANCE CERTIFICATE: THE COURSES

- GENERAL MANAGEMENT PRINCIPLES
  - MG 601 Principles of Management
  - MG 603 Project Management
  - HM 621 Quality Management in Health Care Facilities
  - HM 660 Human Resource Management in Health Services Administration
  - MG 616 Leadership and Ethics in Organizations
HEALTH CARE COMPLIANCE: THE COURSES

- **LEGAL:**
  - HM 668 Legal Aspects of Health Care Delivery
  - LAWS 345 Law & Medicine
  - LAWS 348 Advanced Law and Medicine
  - LAWS 601 Managed Care Law
  - LAWS 352 Healthcare Business Transactions
  - LAWS 542 Regulation of Health Care Industries
HEALTH CARE COMPLIANCE CERTIFICATE: THE COURSES

- FINANCIAL MANAGEMENT
  - HM 664/FM664  Financial Management in Health Care
  - AC 411  Auditing Theory and Practice
HCCB REVIEW PROCESS

- “QUINNIPIAC UNIVERSITY’S COMPLIANCE CERTIFICATE PROGRAM HAS SUCESSFULLY MET ALL THE CRITERIA ESTABLISHED BY THE HCCB.”

- Debbie Troklus, President, HCCB
  - HCCB Press Release
THE REVIEW PROCESS

- **Organizational Review**
  - Is commitment for the program visible?
  - Does the program have statements of mission, values, goals and objectives that are clear, specific, internally consistent and used as a basis for setting direction, program evaluation and quality improvement?
  - Is financial and administrative support adequate to ensure program quality?
  - Facilities, equipment and supplies are adequate to ensure program quality?
HCCB REVIEW PROCESS

- **Program Requirements**
  - Bachelor’s degree required
  - Are there pre-requisites for a potential student?
  - Is the program intended for graduate or undergraduate students?
  - How are students selected for the program?
  - Does the program demonstrate efforts to recruit well-qualified students?
  - Is there a process for handling student complaints/grievances?
  - Program must meet curriculum as set forth in the CHC certification handbook. The following topics must be addressed in the program:
    - Application of management practices for the Compliance Professional
    - Application of personal and business ethics in compliance (including corporate responsibility)
    - Written compliance policies and procedures
    - Designation of compliance officers and committees (Compliance Oversight)
    - Compliance training and education
    - Communication and reporting mechanisms in compliance
    - Enforcement of compliance standards and discipline
    - Auditing and monitoring for compliance
    - Response to compliance violations and corrective actions
    - HIPAA privacy implementation
  - Student must maintain a minimum GPA of 2.0 to be a candidate for certification.
  - A minimum of 15 credit hours will be needed for the compliance certificate program.
Resources

- What textbooks are used for the required curriculum?
- What resources/textbook is used for the compliance course?
- Are examples/case studies used? If so site references.
HCCB REVIEW PROCESS

- **Instruction**
  - Instructors should be committed to the program. (interview selected instructors)
  - Faculty bios on file that demonstrate qualifications/experience needed to ensure program integrity.
- Course syllabi on file
- Is an on-line training/e-learning curriculum being considered?
HCCB REVIEW PROCESS

- Certification (CHC) Exam
- Would the “CHC” exam be offered by the HCCB on campus, or would students need to make application and take the test at one of the testing centers?
HCCB REVIEW PROCESS

- Marketing
  - How will the program be marketed?
HCCB REVIEW PROCESS

- Program Evaluation
- Is there an evaluation process in place to assure that the newly designed program is effective in meeting its desired goals?
- PHASED-IN APPROACH
- ? ON-LINE
- CONSISTENT EDUCATION OF THE PROFESSION
- CONTINUE TO INCREASE SIGNIFICANCE AND PROFESSIONALISM