Connecting HR & Compliance to Keep Patients Safe
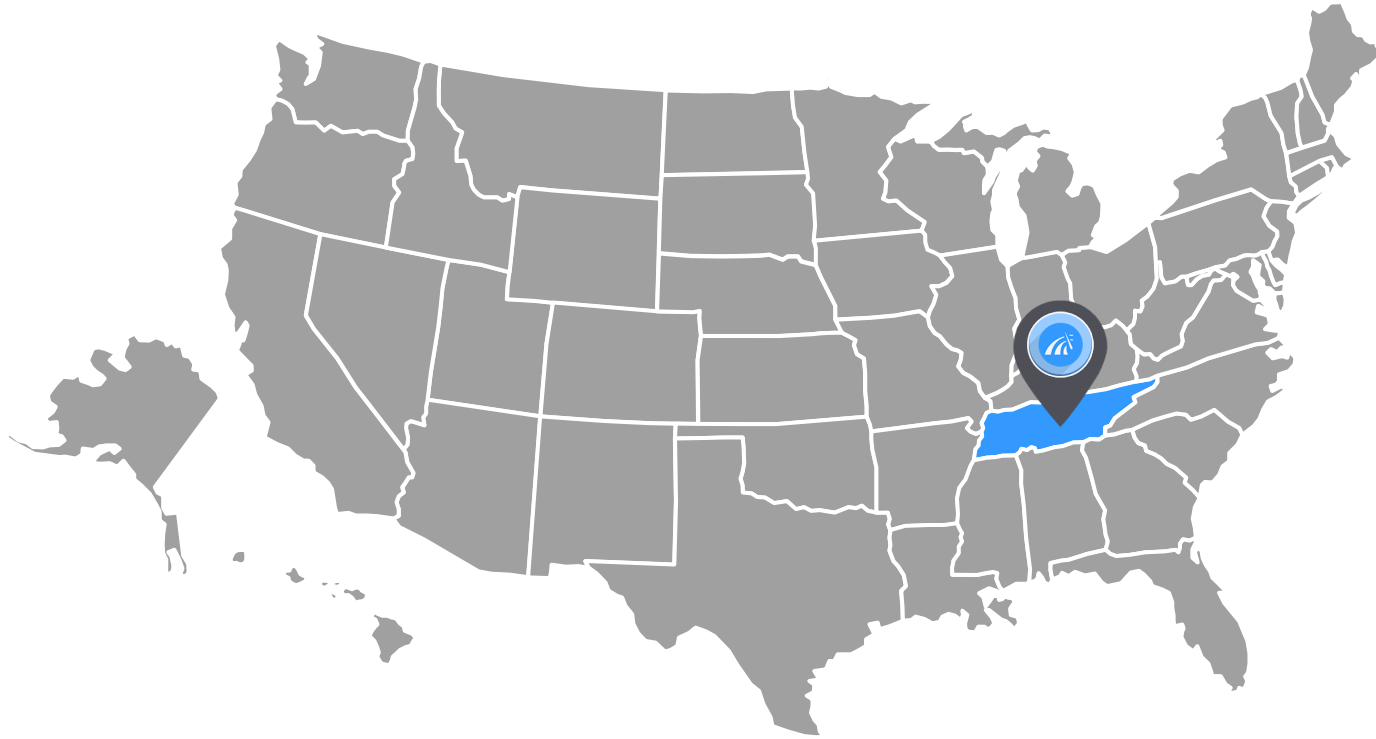
July 29, 2021

Made With ❤ in Nashville

Insights from America's healthcare capital!

PROVIDER*TRUST*

A **smarter** healthcare makes a **safer** healthcare.

From healthcare license verifications and OIG exclusion checks to enterprise compliance and eligibility monitoring, we deliver it all in **one powerful platform.**

Agenda

1. Partnering to Ensure Compliance

2. Importance of Trust, Collaboration & Communication

3. Monitoring Employees Together

4. Solidifying the Partnership: Next Steps

Partnering to Ensure Compliance

HR & Compliance Partnership

It's a **natural partnership**

Most people issues require HR **and** Compliance expertise

Both **involve people** and **affect people**

Both departments **are accountable** for ensuring patient safety

The Seven Elements of an Effective Compliance Program - (*So many shared accountabilities*)

Enforcement & Discipline

Education & Training

Monitoring & Auditing

Reporting

Policies & Procedures

Response & Prevention

Compliance Official

Importance of **Trust**, Collaboration & Communication

Internal Trust → Patient Trust

- **HR & Compliance share the ultimate goals of:**
  - Keeping their patients safe
  - Preventing fraud, waste, and abuse

- **To ensure alignment between departments, it's vital to:**
  - Get to know each other on a personal level to establish a foundation of trust
  - Assume positive intent
  - Establish appropriate boundaries and ensure proper division of responsibilities
  - Communicate consistently and openly, especially in new or ambiguous situations

> **If we want our patients to trust us, we have to be willing to trust each other."**
>
> *Dylan Thriffiley, VP & Compliance Officer at Ochsner Health*

Collaboration Matters

Build a **culture** of compliance

- HR and Compliance share a consistent message of **doing the right thing**

- A **culture of consistency and fairness** helps prevent whistleblowers

- HR and Compliance should be **familiar faces** to all employees

- The Code of Conduct and Employee Handbook should **jointly guide employees** on expected behavior

- **One message** – it doesn't matter if it comes from HR or compliance – be fair, respectful, and expeditious in responding to concerns

Communication Practices for Joint Success

Ongoing feedback and routine communication are vital as well as recognizing that each individual brings their distinct perspective

Ongoing Feedback:

- It's important to consistently seek feedback from HR if you're in Compliance and vice versa
- Escalating in partnership when disagreements arise is also key

Routine Communication:

- Expectations should be set to ensure visibility. For example:
  - Monthly touchpoint meetings
  - Weekly reports

Monitoring Employees Together

How Can HR & Compliance Share Monitoring Oversight?

Role of Compliance — **Joint Role** — **Role of HR**

Role of Compliance

Explain the impact to the organization of an excluded or unlicensed person

Determine the facts of the issue

    Federal (OIG LEIE or SAM.gov)

    State (Licensing Board or Medicaid exclusion list)

    Current / historical

Joint Role

Conduct an investigation

Review procedures to see if there was a breakdown in process or human error

Determine the future of the employee

Determine what, if any, self-report obligation may exist

Role of HR

Identify "story" of the employee

What is their job role?

When were they hired?

Review information gathered pre-hire

Any recent employment concerns

What Happens When There's an Exclusion Match?

- Probably **Code Red**
- An employee *likely* gets suspended
- HR and Compliance immediately begin an investigation
- External resources may be engaged
- Decisions must be made related to self-reporting to the OIG and / or State Medicaid
- Potential for fines and sanctions
- Identification of process improvement opportunities
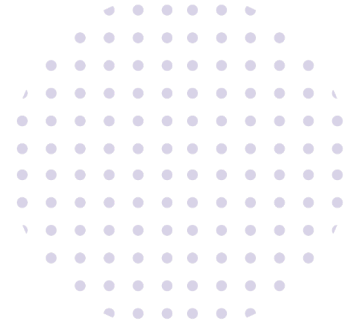
Employee Monitoring in One Powerful Platform

Sanctions

Monitor state licensing boards across all 50 States and all healthcare disciplines for any administrative actions.

Licenses

Verify licenses and credentials are active, valid, and up-to-date for every job function within your health system.

Exclusions

Monitor all personnel across all Federal (OIG LEIE and SAM) and State Medicaid exclusion lists.

Solidifying the Partnership: Next Steps

Evaluate Your Current Processes

1. How **often** do you screen your providers, employees, and third-parties for exclusions or disciplinary actions?

2. How **accurate** is your provider credential information?
   a. Have your employees changed their names?
   b. Have they moved outside of a compact license state and updated their license?

3. How are credential concerns **communicated across teams**? How **quickly** does this occur?

4. Are there regular **cross-functional meetings** about employee monitoring best practices?

Plan for Collaboration

- Define roles and responsibilities for each department

- Identify overlap / duplicity

- Identify areas of risk that should be monitored

- Define a cadence for communication – e.g., weekly meetings

# Collaboration: Initial & Ongoing

Initial

- Ensure the right people are caring for your patients (background checks, criminal, abuse registries, OIG LEIE)

- Provide consistent compliance messaging upon hire

- Disseminate the of Code of Conduct and Employee Handbook

- Validate licensing and certification requirements

- Ensure compliance with all State and Federal documentation requirements

Ongoing

- Share joint values

- Monitor staffing / turnover metrics

- Stay current with regulatory changes and required messaging

- Review disciplinary actions

- Monitor licensed professionals

- Monitor for exclusions

- Collaborate on hotline investigations and HR-related audits

- Ensure HIPAA awareness

Questions?

Browse Our Library on ProviderTrust.com
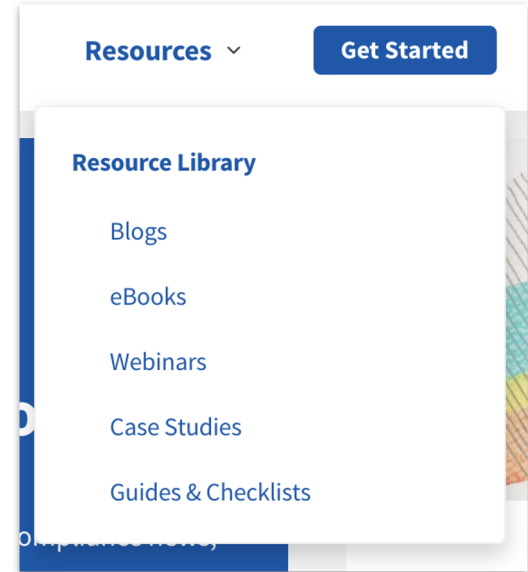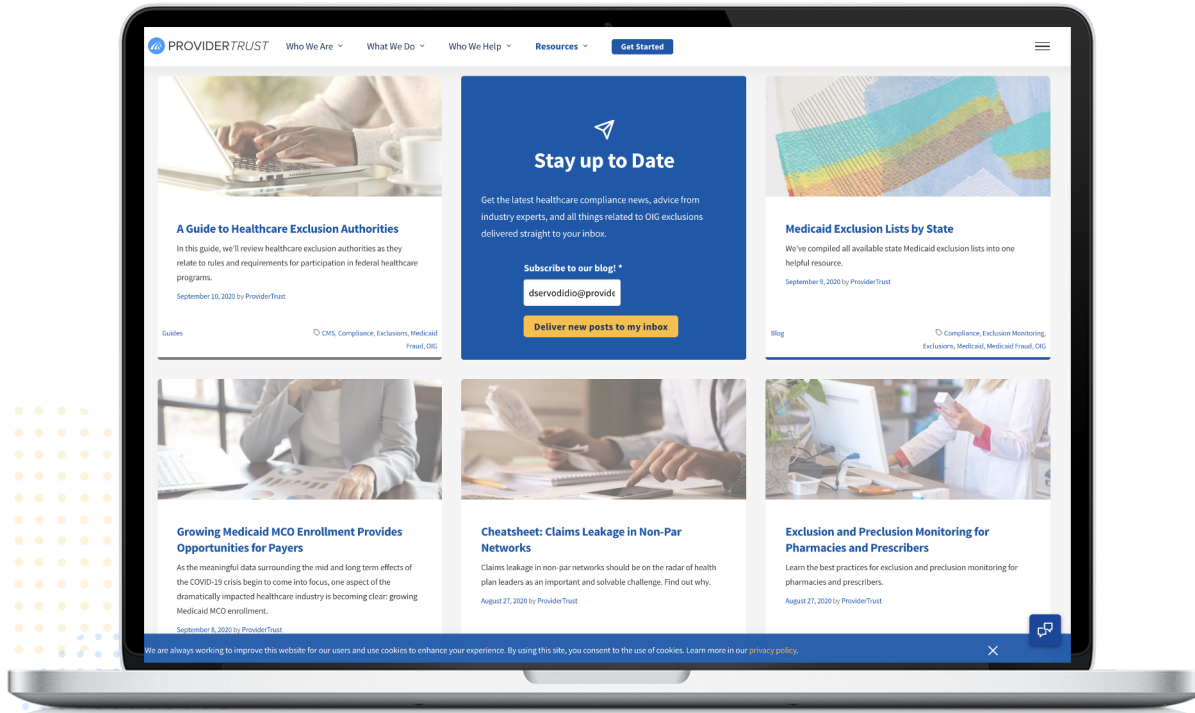
Let's talk!

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Interested in a demo? Click **here**!