



**HCCA's 12<sup>TH</sup> ANNUAL COMPLIANCE INSTITUTE**

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***Achieving Consistency in Your Compliance Program at a  
Large, Multi-Hospital System***

***Advanced Discussion Group***

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## Program Discussion Topics

***Participants can choose from any of the following  
topics to discuss:***

- Designing a compliance infrastructure that is flexible for the size and complexity of your organization.
- Organizing a compliance network that encourages consistent and timely compliance education to all employees
- Coordinating compliance efforts to adequately address HIPAA Privacy and Security issues



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## Program Discussion Topics (cont'd)

- Generating and disseminating consistent guidance for conflict of interest and other compliance-related questions
- Fostering communication between compliance and internal audit to improve efficiency and avoid duplication of work
- Organizing an internal assessment process that tests for consistency of information and compliance program effectiveness throughout the multi-hospital organization



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## Flexible Compliance Infrastructure

- The Compliance Program must be flexible enough to meet the challenges your organization faces:
  - Adapting to new identified risk areas (ex. Research, Joint Ventures, Medical Staff Services)
  - Adapting to new facilities and service lines (ex. Outpatient Clinics, Surgery Centers, LTC Facilities)
  - Realigning staff responsibilities and oversight when acquisitions and mergers occur



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## Organizing Your Compliance Network

- In large facilities, it can become cumbersome identifying all responsible parties:
  - Administrators
  - Department Heads
  - Mid-level Managers
  - New Physicians
  - New Employees
  - Vendors and Contract Employees
- The Compliance Department must be able to communicate with all levels of the organization



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## Complying with HIPAA Privacy and Security Rules

- Education must be appropriate for all levels of employees
- Ongoing monitoring and reeducation in high-risk populations
- Partnering, when possible, with Compliance and Internal Audit to appropriately and efficiently handle issues when identified.



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## Consistent Guidance on Compliance-Related Issues

- Direct calls to the Compliance Department inquiries will continue to increase as education initiatives grow
- Databases and inquiry logs can be used to track calls and serve as reference information.  
Allows Compliance Department to :
  - Provide consistent guidance on compliance-related inquiries
  - Identify trends and develop risk area specific education for areas where improvement opportunities are identified



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## Communication Between Compliance and Internal Audit

- Foster communication between Internal Audit and Corporate Compliance
- Develop education programs and seminars to share relevant information and skills
- Promote joint auditing, when possible, to improve efficiency and avoid duplication of effort



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## Internal Program Effectiveness Assessment

- Annual assessment identifies inconsistencies or areas of program weakness
- Effective for multi-hospital systems to develop benchmarking and internal compliance program process improvement metrics
- Creates opportunity for Compliance Department and Internal Audit to work together to improve internal controls and processes



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