



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

APRIL 13–16, 2008 | NEW ORLEANS, LA | HILTON RIVERSIDE NEW ORLEANS

## Simple Strategies in Promoting Effective Long Term Care Compliance

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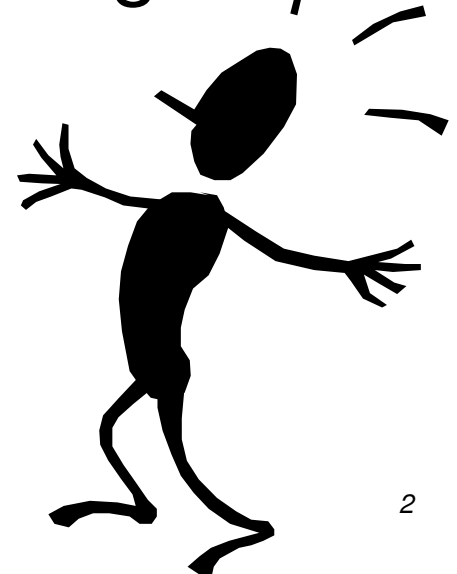
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# Objectives

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- Avoid being overwhelmed in promoting Long Term Care compliance effectiveness
- Identify, prioritize and focus on Long Term Care compliance risk areas
- Implement simple evidence-based compliance strategies within existing LTC facility programs



# Stuck in the Middle with You!



CEO/Board

Compliance Officer

OIG



# Resource Documents

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- March 2000: OIG Compliance Program Guidance for Nursing Facilities
- January 2003: HCCA Evaluating and Improving a Compliance Program
- Others: HCCA, Federal Sentencing Guidelines, Advisory Opinions, Fraud Alerts, List Serves, etc.



# Your Compliance Program

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- Should be fluid, individualized, depending on your organization's size, resources, business activities, behaviors, etc.
- Should have 2 components:
  1. **Structural:** Includes the basic framework necessary to build and operate a compliance program.
  2. **Substantive:** Relates to the specific body of substantive law.

# Evaluating and Measuring

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- Analyze each of the 7 compliance plan elements in two distinct dimensions:
  1. **Effort:** Is the time, money, resources and commitment that an organization puts into building and improving its compliance program.
  2. **Outcomes:** The impact that our efforts have on the level of compliance.

# Code of Conduct and Polices

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- Rationale
- Relevant Issues
- Implementation
- Role of Compliance Officer

# Code of Conduct and Policies

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- Evaluation and Measurement

1. Effort:

2. Outcome:



# Education and Training

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- Rationale
- Relevant Issues
- Implementation
- Role of Compliance Officer

# Education and Training

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- Evaluation and Measurement

1. Effort:

2. Outcome:



# Auditing and Monitoring

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- Rationale
- Relevant Issues
- Implementation
- Role of Compliance Officer

# Auditing and Monitoring

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## Evaluation and Measurement

1. Effort:
2. Outcome:



# Communicating and Reporting

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- Rationale
- Relevant Issues
- Implementation
- Role of Compliance Officer

# Communicating and Reporting

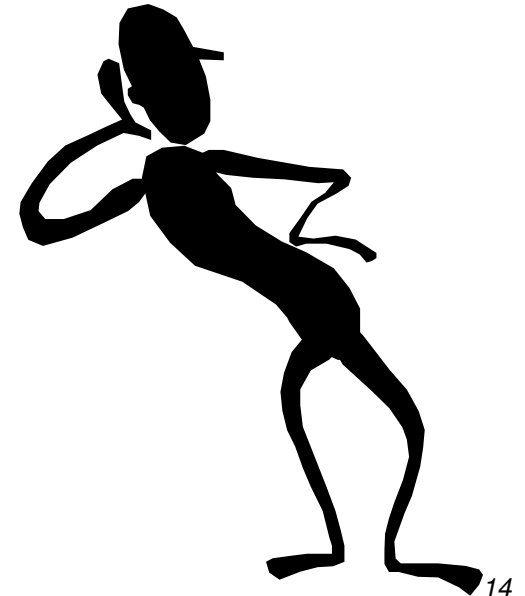
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- Evaluation and Measurement

1. Effort:

2. Outcome:



# Investigating and Prevention

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- Rationale
- Relevant Issues
- Implementation
- Role of Compliance Officer

# Investigating and Prevention

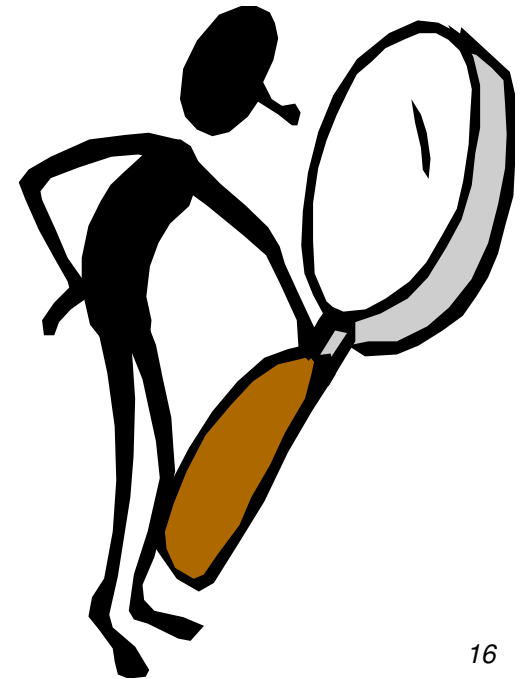
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- Evaluation and Measurement

1. Effort:

2. Outcome:



# Enforcement and Discipline

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- Rationale
- Relevant Issues
- Implementation
- Role of Compliance Officer

# Enforcement and Discipline

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- Evaluation and Measurement

1. Effort:

2. Outcome:



# Conclusion

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- Evaluating the effectiveness of a LTC compliance program is essential in identifying and mitigating risks.
- Utilizing existing LTC organizational structures and systems will improve the efficiency and effectiveness of the compliance program.
- Being able to quantify compliance efforts and outcomes as evidenced-based, supports your measures of compliance effectiveness.



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## Thank You!

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2008



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April 13–16, 2008

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