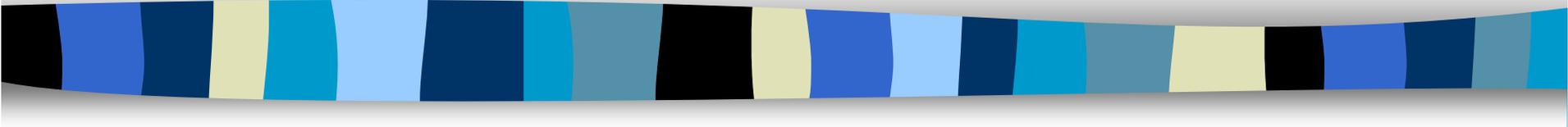


Health Care Agency Office of Compliance

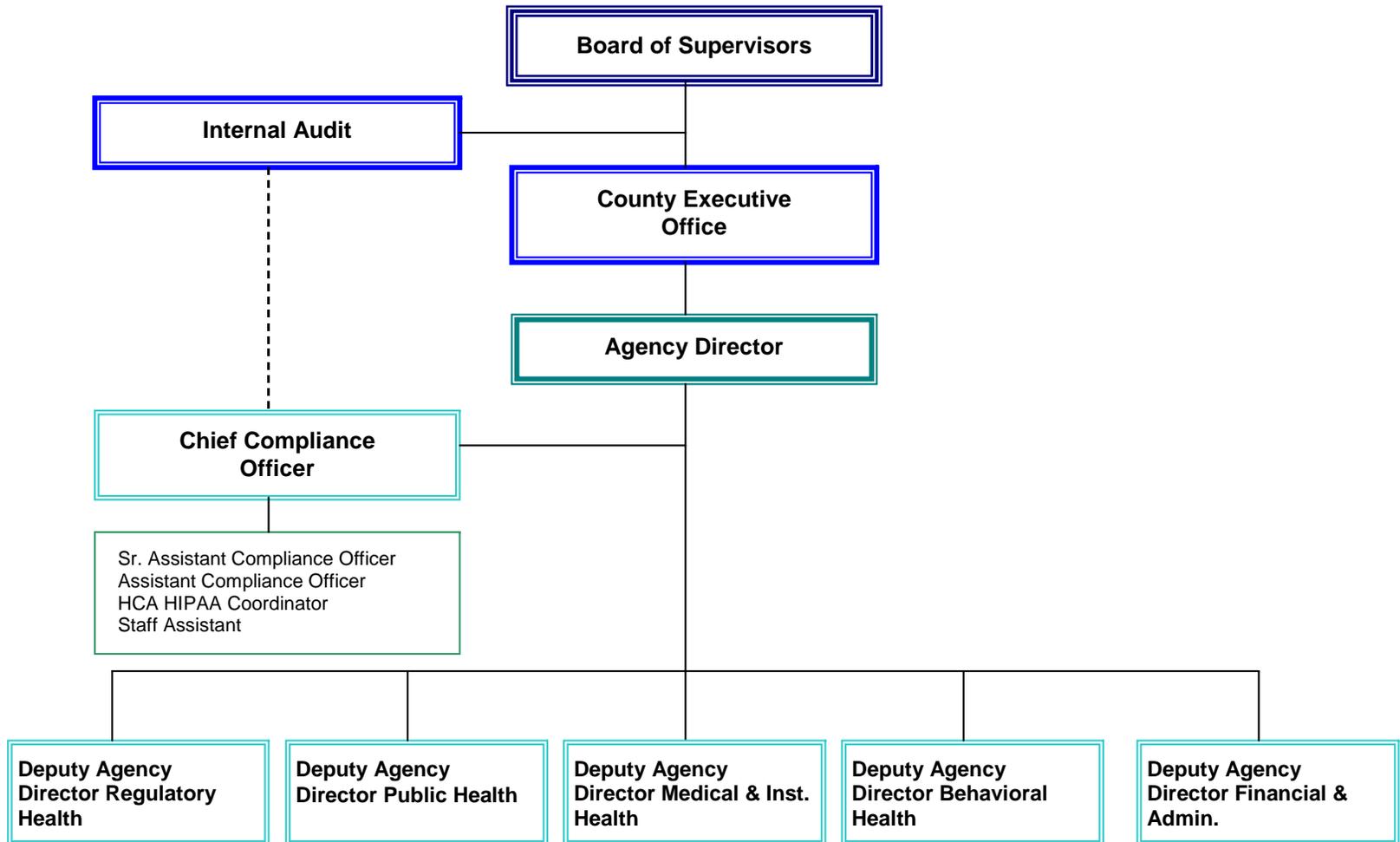


November 2, 2005

Audit Oversight Committee
Presentation

Jeffrey A. Nagel, Ph.D., CHC

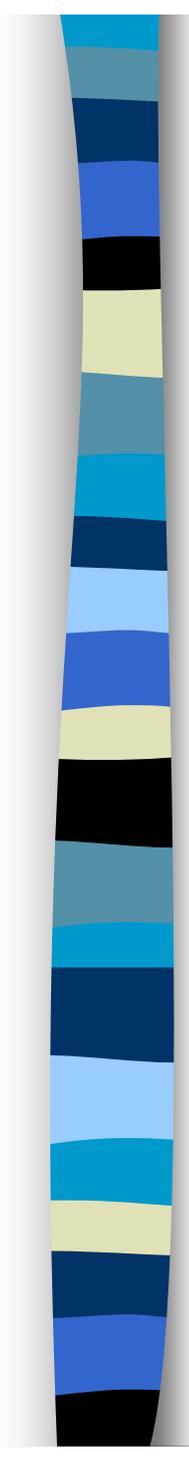
Office of Compliance Organizational Structure





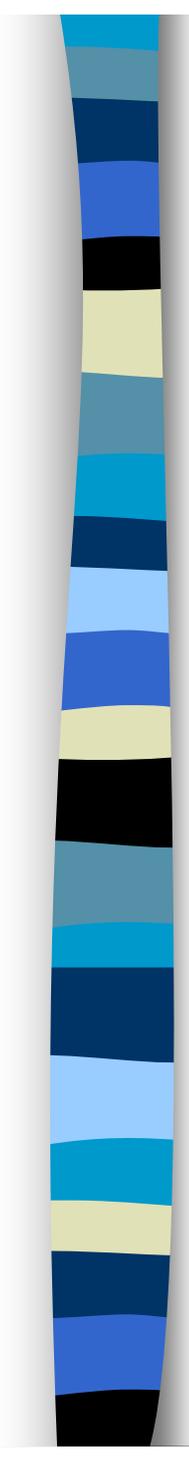
Elements of an effective Compliance Program

- Compliance Officer and Committee
- P&Ps and Code of Conduct
- Sanction screening
- Training
- Confidential Disclosure program
- Auditing and monitoring



Accomplishments

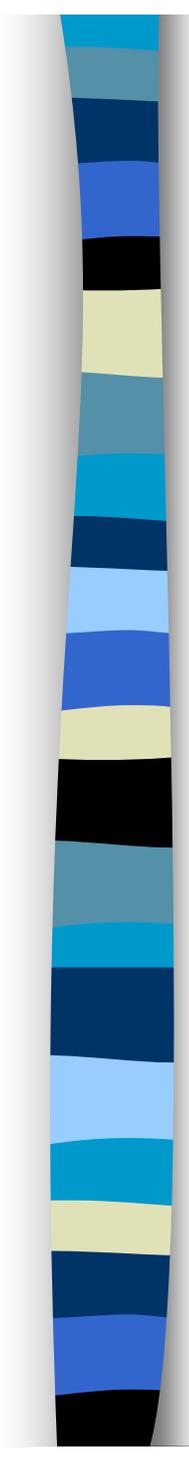
- Increased Internal Control
 - Annual Risk Assessment
 - External audits of higher risk areas (billing and coding)
 - Self-audits of key program elements
 - Development of clearly articulated standards for behavior
 - Training to all staff
 - Investigations of issues (via hotline or other means of communication)



Accomplishments (Continued)

■ Increased Communication

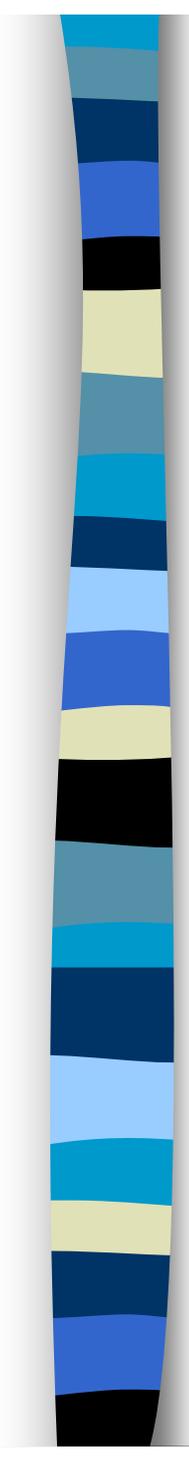
- Code of Conduct developed, and distributed to all employees
- Hot line established and employees provided with confidential manner of reporting concerns
- Annual employee survey assesses employee awareness of compliance program and provides feedback to OOC.
- Monthly column in HCA newsletter



Accomplishments (Continued)

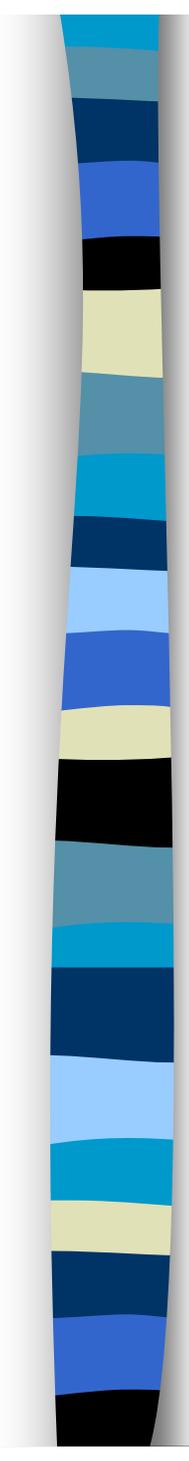
■ Increased Training

- 5th year of compliance training for the workforce
- 100% of HCA employees trained in 2001-2004 over 20,000 hours of general compliance training in 5 years.
- Training offered to agency on-line or in person
- Job specific training given to billing staff and clinical staff
- Site specific training offered based on findings of audits or investigations



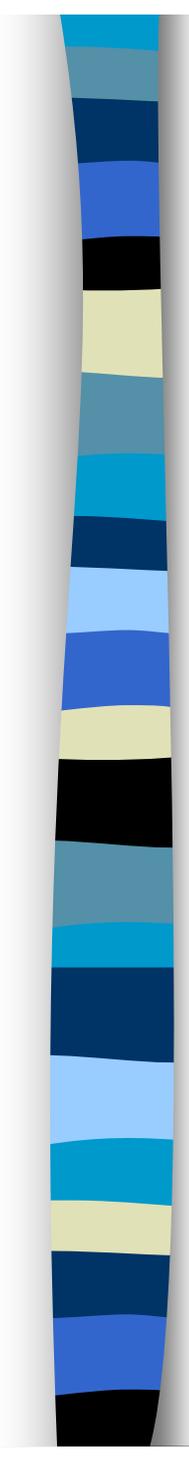
Accomplishments (Continued)

- Confidential Disclosure Program (hotline) established
 - Non-retaliation policy for employees who report issues in good faith
 - Agency wide implementation
 - Additional level of check and balance
 - Has resulted in identification and correction of issues on a proactive basis.
 - Has resulted in a decrease in liability to the agency, and savings to the agency



Accomplishments (Continued)

- Annual evaluation of compliance program to determine effectiveness
 - Benchmark program performance against existing standards
 - Demonstrate improvement in program over time
 - Provides comprehensive review of operations of compliance program



Future Steps

- Compliance programs are never static
 - Adapt to insure compliance with new legislation, mandates, regulations and policies
 - Establish yearly work plan based on industry risk, agency concerns, and areas of limited internal control
 - Establish network of County compliance officers