



COMPLIANCE PROGRAM EDUCATION AND TRAINING PROGRAMS

By Jillian Bower, MPA

The Department of Health and Human Service Office of Inspector General (OIG) calls for in their compliance program guidance documents that healthcare organizations properly train and education their corporate officers, managers, employees, physicians and healthcare professionals (collectively referred to as "staff"). The training should address specific topics, such as Federal and state statutes and regulations, fraud and abuse laws, the organization's compliance program, and claims development and submission. The OIG further advocates that the training should be mandatory for all staff members and a condition of employment.

Therefore, an effective compliance program is one that includes ongoing and continual training and education. But in order for the compliance program to be effective, the training must be effective.

How do you ensure that the training is effective? Compliance Resource Center, along with our partner Strategic Management Services, has provided compliance program training to various types of healthcare organizations. Based on our experience and trends we have seen over the years, there are several metrics to measure how effective is the training.

First, an almost immediate metric is testing staff after the training. Over the years, I have worked with clients who have increasingly asked for quizzes and scenarios to be included in the training program. In today's technology age, more organizations are delivering training via e-Learning or online training modules. Therefore, the responsibility is on the staff to go through the material. The inclusion of quizzes and scenarios enhance the training by adding an interactive component, as well as enhances the learning aspect. Compliance Resource Center's training module includes features to score the quiz to ensure that the staff member has a passing score before completing the training and to not allow the staff member to advance to the next slide before answering correctly. These features in e-Learning modules provide metrics for measuring effectiveness of the training.

Second, after the training, specific topics or policies addressed in the training should be monitored and audited. Monitoring and auditing activities examines whether the training presented procedures that were understood and can be effectively carried out by staff. Any adverse issues identified indicate a need for further training or clarification in the training program.

Third, review the concerns or questions reported through the compliance hotline or to the Compliance Office or Human Resources. Communication avenues offer a good read on what is happening within the organization.

What each of the above metrics has in common is the element of gaining feedback from the staff. Ultimately, the effectiveness of the training can be seen by how well the staff carry out the organization's policies and standards, as addressed in the training program.

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