



## COMPLIANCE PROGRAM EVALUATION METHODS: WHAT ARE YOUR OPTIONS?

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The healthcare compliance program is the backbone of an organization's business operations and workforce. With increased enforcement and sanctions on healthcare organizations by the U.S. Department of Health and Human Services Officer of Inspector General it is imperative that the compliance program is effective. Therefore, an organization must implement compliance program evaluation methods to ensure the program is operating effectively.

Several compliance program evaluation methods to use include: 1. Compliance program reviews by an external independent firm; 2. Annual compliance audits; 3. On-going monitoring of processes and policies; and 4. Compliance effectiveness survey.

First, engage with an independent firm to conduct a healthcare compliance program review. Use a firm with expertise and experience in evaluating healthcare compliance programs. A compliance program review helps to answer whether the program adequately covers the seven elements of an effective healthcare compliance program and identifies the strengths and weakness of the current program. These are the types of questions that executive management and the Board of Directors frequently ask the compliance officer. An independent firm provides a more objective review of the program and is highly valued by the Board of Directors and outside government auditors.

Second, annual audits should be conducted on key elements of the healthcare compliance program. Findings of the audit will reveal areas of strengths and areas that warrant improvement. Based on the findings, compliance officers can develop a remediation plan to address weaknesses. Annual audits should be conducted more often than a compliance program review.

Third, ongoing monitoring is a must. The department/program managers should be engaging in on-going monitoring activities to prevent rising issues of fraud, waste or abuse. Areas to monitor will be identified through the annual audits, as well as high risk areas, such as billing and coding, and those identified by the OIG and government auditors.

Finally, compliance effectiveness surveys are useful in measuring program effectiveness. Traditionally, compliance officers conduct compliance program reviews, audits and monitoring activities. But the use of compliance effectiveness surveys as a compliance program evaluation method tends to be underutilized.

A compliance survey can provide a broad view of how well the compliance program operates. Different compliance survey templates are used depending on what the survey is designed to measure. There are two general compliance survey templates: (1) the Compliance Knowledge Survey and (2) Compliance Culture Survey. First, the Compliance Knowledge Survey assesses compliance program effectiveness by reporting on employees' knowledge, awareness and understanding of the compliance program. Questions are designed to ask employees pointed questions about the seven elements of an effective compliance program with response options of Yes, No and I don't know. The results reveal exactly what employees know and understand, as well as where more attention is needed. Second, the Compliance

Culture Survey measures employees' perceptions and attitudes in evidencing the compliance culture of an organization. The Compliance Culture Survey examines compliance dimensions that focus on personal job satisfaction, compliance with laws and regulations, quality of care/service, employee communication and management and HR practices. Because the Survey is measuring employees' perceptions and attitudes the responses are measured on a Likert Scale ranging from strongly agree to strongly disagree.

Both of these compliance survey templates are useful in measuring program effectiveness. Compliance effectiveness surveys provide powerful and useful measure to understand the performance of the compliance program.

Compliance officers should consider utilizing various compliance program evaluation methods to get the most comprehensive view of the healthcare compliance program. Each evaluation method provides a different view of the healthcare compliance program, and when collective utilized can provide a better overall view of how well the compliance program is performing.

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