

## Effective Training Leads to Effective Compliance Programs

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### Overview

The Department of Health and Human Services Office of Inspector General (OIG) calls for in their Compliance Program Guidance documents<sup>1</sup> that health care organizations properly, and regularly, train and educate their workforce. The training should address specific topics, such as federal and state statutes and regulations, fraud and abuse laws, the policies and operations of the organization's Compliance Program, and development and submission of claims. The OIG further advocates that this training should be mandatory for all workforce members and participation should be made a condition of employment or engagement.

With these requirements in mind, the most effective compliance programs are those that include ongoing training and education for all parts of the organization. But in order for the compliance program to remain effective, the training must be effective.

### Measuring Your Training Program's Effectiveness

How do you ensure that the training is as effective as possible? Based on industry trends, there are several metrics to measure the effectiveness of the training.

First, to get an immediate gauge of the training program's effectiveness, the workforce should complete a test based on the material presented during the training. With today's technology, more organizations are delivering training via learning management systems (LMS) and other online training platforms. This mode of training makes it easier to add test questions and scenarios to the end of the training program. Including questions and scenarios enhances the training by adding an interactive component, which can also improve the way the workforce learns the information. Some training modules include a quiz scoring feature that requires the workforce member to have the correct answer before advancing to the next slide and to have a passing score before completing the training. These features in LMS platforms provide powerful metrics for measuring the effectiveness of the training.

Second, after the training is complete, the Compliance Department should audit specific areas or policies that were addressed in the training. Auditing activities can reveal whether the training presented information or procedures that the workforce understood and whether the workforce can effectively practice such procedures in the work environment. The Compliance Department

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<sup>1</sup> <https://oig.hhs.gov/compliance/compliance-guidance/index.asp>

should consider conducting follow-up training to provide clarification or to address issues identified during their audit.

Third, the Compliance Officer and/or other appropriate individuals should review the concerns or questions reported through the compliance hotline or reported directly to the Compliance Department or the Human Resources Department. Communication channels, such as a hotline or questions directly from the workforce, can offer a good read on policies, procedures, or processes that workforce members are confused about or are inadvertently violating despite receiving regular compliance training. If workforce members do not understand the compliance concepts, then the training may need to be further clarified or detailed. Furthermore, if workforce members are reporting verified violations of compliance policies, procedures or processes, then it may be useful to hold another training session to refresh the workforce on proper operating procedures to avoid future compliance issues.

Each of the above metrics shares the element of gaining feedback from the workforce. Ultimately, you can see firsthand how effective the compliance training is by how well the workforce carries out the compliance policies and standards, as addressed in the training program.

## **In Review**

Measuring the effectiveness of your training program can help determine the effectiveness of your Compliance Program. By enacting a series of checks following a training session, organizations can make sure that the workforce fully comprehends the training and is prepared to actively practice the concepts reviewed in the training program in the work place. Organizations should also listen to workforce members' feedback on the training to help improve its functionality and its role in maintaining an effective compliance program.

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## **About the Author**

Jillian Concepcion is the Vice President of Business Development of Compliance Resource Center and a Senior Consultant at Strategic Management Services. Ms. Concepcion leads client engagements involving compliance program development, implementation, evaluation, and remedial action to correct deficiencies. She also helps organizations implement effective processes to enhance their compliance programs related to sanction and exclusion screening, hotline programs, policies and procedures and training programs.

## **About Compliance Resource Center**

Compliance Resource Center has been leading the compliance industry since 2010 with our complete suite of solutions that are geared towards improving compliance program operations. Our solutions ensure that organizations regularly meet federal and state laws and supply the necessary resources to sustain long-term compliance.