

# Meeting the Challenge: Implementing a Company-wide Compliance Program

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*by Sue Prophet, RHIA, CCS*

Convention attendees gained valuable insights into the development of a compliance program during "Meeting the Challenge: Implementing a Company-wide Compliance Program," a presentation by Susan Postal, MBA, RHIA. Postal provided an overview of the major components of the ethics and compliance program developed by HCA.

Postal noted that HCA's goal for its ethics and compliance program is to ensure that employees, physicians, vendors, and others are familiar with the laws, regulations, and policies that affect them, understand the organization's commitment to follow them, understand their basic organizational values and commitment to stakeholders, and can make decisions reflecting these values and their commitment.

## One Clear Voice

The program's basic activities include setting standards, creating awareness, identifying exceptions, providing organizational support, and monitoring performance. To set standards, the organization developed a code of conduct and policies and procedures.

With the theme "One Clear Voice," the code of conduct addresses risk areas, mission, and values, and the organization's fundamental commitment to stakeholders. Policies and procedures were developed for general ethics, billing, coding, physician relationships, cost reporting, record retention, self-reporting, credit balances, appropriate access/patient confidentiality, and background investigations.

Initially, Postal said, too many policies and procedures were developed and the sheer volume overwhelmed employees. The need to start more slowly and prioritize policy and procedure development was a valuable lesson learned, she added.

To create awareness, the code of conduct has been rolled out to all employees, physicians, vendors, and major suppliers. Refresher training is provided every year. Training programs use videotapes containing vignettes of real-life situations, giving participants opportunities to discuss the scenarios and proper courses of action. "Compliance alerts" reinforce key issues or address new ones.

HCA also has developed intranet and Internet sites related to the compliance program. The Internet site ([www.hcahealthcare.com](http://www.hcahealthcare.com)) contains policies and procedures, the code of conduct, and compliance training tools.

Postal noted that the corporate ethics and compliance program aims to provide overall guidance, direction, and support to the individual entities. Accordingly, each HCA entity has its own compliance program and compliance officer. Depending on the size of the entity, the compliance officer position may be a full-time job or the individual may serve in a dual role.

## Focus on HIM Services

In addition to its overall ethics and compliance program, HCA also has developed a corporate coding/HIM compliance program with the theme of "Complete, Accurate, and Consistent Coding." A steering committee, comprised of coding and HIM professionals from HCA facilities, provides guidance and direction on enhancing the program. A multidisciplinary coding compliance committee, which includes representatives from coding, billing, and internal auditing, also provides input into the coding/HIM compliance program.

As part of this initiative, 12 coding/HIM policies and procedures supporting HCA's commitment to complete, accurate, and consistent coding have been adopted. These include:

- coding and documentation policies for inpatient and outpatient services and skilled nursing facilities/units
- coding references, tools, and help line
- coding orientation, training, and continuing education requirements
- coding/HIM reimbursement of license/credential examination fee
- additional compensation plans
- prohibition of contingency-based coding arrangements
- certified external vendors for coding reviews and related education
- outpatient services and Medicare three-day window

## An Ongoing Commitment

Postal noted that it is important for healthcare organizations to demonstrate commitment to provide the time and money necessary to empower people to be successful. HCA is committed to ensuring that staff have the necessary references and tools to do their jobs effectively, such as up-to-date code books, access to *Coding Clinic*, anatomy and physiology textbooks, and a drug reference.

Training and education are key components of the coding/HIM compliance program, she emphasized. In addition to face-to-face training, courses are also offered via the intranet. Coding is routinely monitored to identify opportunities for improvement and an action plan is initiated to resolve any problems. HCA is preparing to deploy online analytical processing software at the facility level to facilitate high-level statistical monitoring, Postal said.

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