

Compliance Orientation Guidelines

Consider using a pre-test and post-test

1. Learning objectives/purpose of session
 - a. Understanding of regulatory environment
 - b. Overview of Corporate Compliance and components of the CC plan
 - c. Understanding of service delivery and documentation requirements
 - d. Understanding of their responsibilities within the Compliance plan
2. Overview of Laws and Regulations
 - a. Employment and discrimination
 - b. Governance, licensing & certification
 - c. Protection from abuse
 - d. Health and safety
 - e. Physical environment
 - f. Service provision
 - g. Billing and reimbursement
3. Overview of Policies/Procedures/Practices
 - a. Location
 - b. Intent
 - c. Employee's role
4. NY Medicaid Program
 - a. Discussion cost
 - b. Waiver services
 - c. Funding for agency services
 - d. Example of utilization as insurance
5. Oversight agencies
 - a. Review of external audit process
 - b. OMIG role/work plan
6. Review of Regulations
 - a. Prepare and maintain contemporaneous records and keep....
 - i. Discuss on documentation standards per agency
 - b. Overpayment
 - c. Submit claims, true, accurate, complete
7. Deficit Reduction Act
 - a. False Claims Act
 - i. Definitions/prohibit
 - ii. Fines
 - iii. Qui Tam Actions
 - iv. Common examples
 - b. Whistleblower protections
 - i. Reporting requirements
 - ii. Ways to report/Hotline
 - iii. Compliance Officer

- c. Fraud/Errors
 - i. Transparency
 - ii. Audits
 - iii. Self Disclosures

- 8. Review of the 8 elements and how the agency implements
 - a. Written policies/procedures
 - i. List of policy topics/overview
 - ii. Compliance oversight
 - 1. Compliance Officer duties
 - iii. Training/Education
 - iv. Effective, confidential Communications
 - v. Enforcement of Compliance Standards
 - vi. Internal Audits
 - vii. Follow up and Corrective actions
 - viii. Whistleblower protections

- 9. Code of Conduct Review/Sign off

- 10. Service Planning, Delivery, Documentation
 - a. Review Agency compliance standards
 - b. Use examples!
 - c. Documentation do's and don't's