



POLICIES AND PROCEDURES

MEDICARE PRESCRIPTION DRUG PART D
HCCA COMPLIANCE CONFERENCE
BALTIMORE, MARYLAND
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AL JOSEPHS
SENIOR DIRECTOR POLICIES AND TRAINING
TENET HEALTHCARE CORPORATION
DALLAS, TEXAS



OBJECTIVES

- WHAT POLICIES AND PROCEDURES
 - BUILDING A FOUNDATION
 - GENERAL AND RISK AREAS
- ORGANIZE FOR SUCCESS
 - CONTROL/OVERSIGHT
 - DEVELOPMENT
- EDUCATION
 - METHODS





BUILDING A FOUNDATION

- **CODE OF CONDUCT**
 - ESTABLISHES COMMITMENT TO COMPLIANCE
 - SETS EXPECTATION FOR EMPLOYEE COMPLIANCE
 - ENCOURAGES REPORTING OF SUSPECTED VIOLATIONS
 - OUTLINES CONSEQUENCES FOR FAILURE TO COMPLY
 - ESTABLISHES RIGHT OF EMPLOYEES TO REPORT CONCERNS WITHOUT RETRIBUTION OR RETALIATION





GENERAL/RISK AREAS

- IDENTIFY THOSE AREAS REQUIRING POLICIES AND PROCEDURES:
 - POLICY ON POLICIES AND PROCEDURES
 - POLICY RELATED TO CODE OF CONDUCT
 - GIFTS AND ENTERTAINMENT
 - RELATIONSHIPS WITH VENDORS
 - REPORTABLE EVENTS
 - RETALIATION
 - CONFLICTS OF INTEREST
 - PRIVACY





GENERAL/RISK AREAS

- IDENTIFY THOSE AREAS REQUIRING POLICIES AND PROCEDURES:
 - COMPLIANCE PROGRAM
 - BOARD COMMITTEE CHARTER
 - STEERING COMMITTEE CHARTER
 - MANAGEMENT OF CONTRACTS
 - HUMAN RESOURCES
 - COMPLIANCE TRAINING ATTENDANCE
 - ELEMENT OF ANNUAL EVALUATION





GENERAL/RISK AREAS

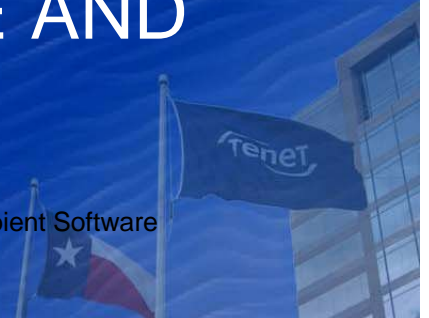
- DETERMINE RISK AREAS :
 - BILLING AND REIMBURSEMENT
 - PHYSICIAN RELATIONSHIPS
 - OTHER REFERRAL SOURCE
 - DOCUMENTATION
 - AUDITING AND MONITORING
 - INVESTIGATION
 - REPORTING





WHAT ARE THE QUESTIONS?

- ✓ HAS EVERYONE READ AND ACKNOWLEDGED?
- ✓ IS THERE A BETTER, FASTER WAY TO DOCUMENT PROCEDURES?
- ✓ WHERE CAN I FIND THAT PROCEDURE?
- ✓ HOW CAN I PROVE TO AUDITORS THAT WE ARE FOLLOWING OUR PROCEDURES?
- ✓ HOW DO I KNOW THIS IS ACCURATE AND UP-TO-DATE?





WHAT ARE THE QUESTIONS?

- ✓ IS THIS THE MOST CURRENT VERSION?
- ✓ HOW DO I GET FEEDBACK TO THE PROCEDURE OWNER IN A MANNER WHERE IT WON'T GET LOST?
- ✓ HOW CAN I MANAGE MY POLICIES AND PROCEDURES GLOBALLY?
- ✓ HAS THIS PROCEDURE CHANGED SINCE THE LAST TIME I USED IT? WHAT IS DIFFERENT?





CONTROL / OVERSIGHT





CONTROL / OVERSIGHT

**POLICY COMMITTEE
CONTROL/ISSUING
AUTHORITY**

**SUBJECT MATTER
EXPERTS
Development**

**SUBJECT MATTER
EXPERTS
Development**

**SUBJECT MATTER
EXPERTS
Development**





DEVELOPMENT

- AUTHOR
 - DESIGNATE
 - TRAIN
 - EMPOWER
- REVIEW
 - POLICY COMMITTEE
 - CONTROL
- PUBLISH
 - ELECTRONIC
 - PAPER





DEVELOPMENT

- COMMUNICATE
 - DESIGNATE AUDIENCE
- TRAIN
 - TEST
- PERIODIC REVIEW
 - FREQUENCY
- REVISE
- ARCHIVE





DEVELOPMENT

- KEEP IT SIMPLE
- INVOLVE EMPLOYEES THAT WILL LIVE BY THE POLICIES AND PROCEDURES
- CONSISTENT FORMAT
- ALLOW FOR FEEDBACK
- TRACK QUESTIONS
- REFERENCE MATERIALS
- FORMS





EDUCATION METHODS

- LIVE TRAINING SESSIONS
- SIMPLE DISTRIBUTION
- TESTING
- AUDITING AND MONITORING





QUESTIONS

