

10 Steps To Implementing a Voluntary Compliance Program

1. Watch to the DVD entitled “START UP DVD”. This video will tell you how to begin implementing the compliance program.
2. Have all members of the compliance team watch all of the applicable videos in the compliance program.
3. Determine who is part of your compliance team. It should include the doctor, staff members who are involved in submitting claims and an attorney.
4. Make changes to the compliance program to make it ‘custom-fit’ your office. The documents are in Word form so you can make changes to anything that you like. CAUTION: Feel free to ADD anything you like but do not delete anything unless it does not apply to your practice.
5. Make a copy of the DHHS-OIG recommendations along with your personalized 7-step compliance program. Have the staff read the compliance program and sign the last page.
6. Review the forms and procedures with the staff.
7. Give the staff the form entitled “Confidential Employee Interview”. This will serve to give the staff the opportunity to bring to the Compliance Officer (s) attention any areas of the practice which may be vulnerable and possibly need attention.
8. If an issue is detected from the “Confidential Employee Interview”, determine if the issue warrants correction. If so, fill out a Correction Notice and make all appropriate changes to office policy that is necessary.
9. Address the staff member(s) responsible for the correctable action.
10. Start your benchmark audit for a period of 90 days.

7 Steps of a Voluntary Compliance Program

1. Conducting internal monitoring and auditing through the performance of periodic audits. These include:
 - a. Standards and Procedures audits
 - b. Claim Submission audits
2. Implementing compliance and practice standards through the development of written standards and procedures.
3. Designating a compliance officer or contact(s) to monitor compliance efforts and enforce practice standards.
4. Conducting appropriate training and education on practice standards and procedures.
5. Responding appropriately to detected violations through the investigation of allegations and the disclosure of incidents to appropriate entities.
6. Develop open lines of communication, such as:
 - a. Discussion at staff meetings about avoiding erroneous or fraudulent conduct.
 - b. Community bulletin boards, to keep employees updated.
7. Enforcing disciplinary standards through well-publicized guidelines.

REMEMBER: Implementing a voluntary compliance program ensures that the office stays up to date on regulatory changes and promotes better organization. It also reduces stress associated with behavior that is against office policy by creating a protocol for employees to follow.