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EXPERT RURAL HEALTH CONSULTANTS

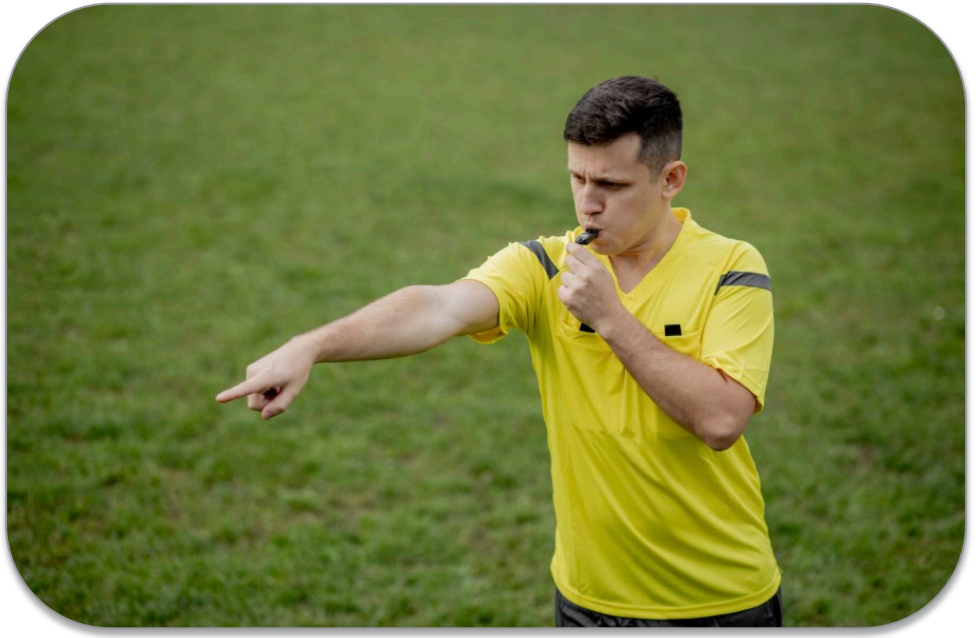
Building an Internal Compliance Program

In Partnership with the Oregon Office of Rural Health

OREGON OFFICE of RURAL HEALTH

Agenda

- Take steps to establish an internal RHC compliance program
- Explore helpful tools to monitor and audit compliance at the RHC
- Determine goals for the improvement project through the cohort



What is Teamwork?

Teamwork requires **more than just communication skills**, coordination or even mutual goals. As a **guiding principle**, effective teamwork requires a **collaborative mindset** that recognizes the inherent value of the team model and a commitment to building effective relationships. - Ted A James, MD



Collaborative Mindset

- Respect for the individuals on our team
- Awareness of how our actions affect our teammates
- Awareness of how our actions affect clinical outcomes
- Must be a core value

How to promote collaborative mindset



Know your team



Build a great foundation



Know the office deficiencies



Recognize the strengths and use them



Create a positive atmosphere

Reaching our Goals

- Quality patient care
  - Safe
  - Effective
  - Patient centered
  - Timely
  - Efficient
  - Equitable

Reaching Our Goals

- Compliance helps us meet our goals
- Measuring tools:
  - Self audits
  - Environmental rounding
  - Performance evaluation
  - Program evaluation
  - RHC survey



Creating an Internal Compliance Program

- Purpose:
  - Monitor regulatory compliance and quality standards
  - Identify risks and address non-compliance issues
  - Educate staff on policies, procedures, and updates
  - Promote transparency

Goal: To recognize and resolve concerns ahead of time, so the surveyor doesn't have to.

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Creating an Internal Compliance Program

- Select team members:
  - Involve multi-disciplinary representatives
    - Team lead
    - Provider
    - Clinical staff
    - Administrative staff
    - Support staff



Creating an Internal Compliance Program

- Responsibilities:
  - Conduct regular compliance meetings (ie. monthly or quarterly)
  - Review incidents, audits, corrective actions
  - Monitor ongoing tasks (compliance checklist)
  - Track staff training and certification requirements
  - Encourage input (without retaliation)

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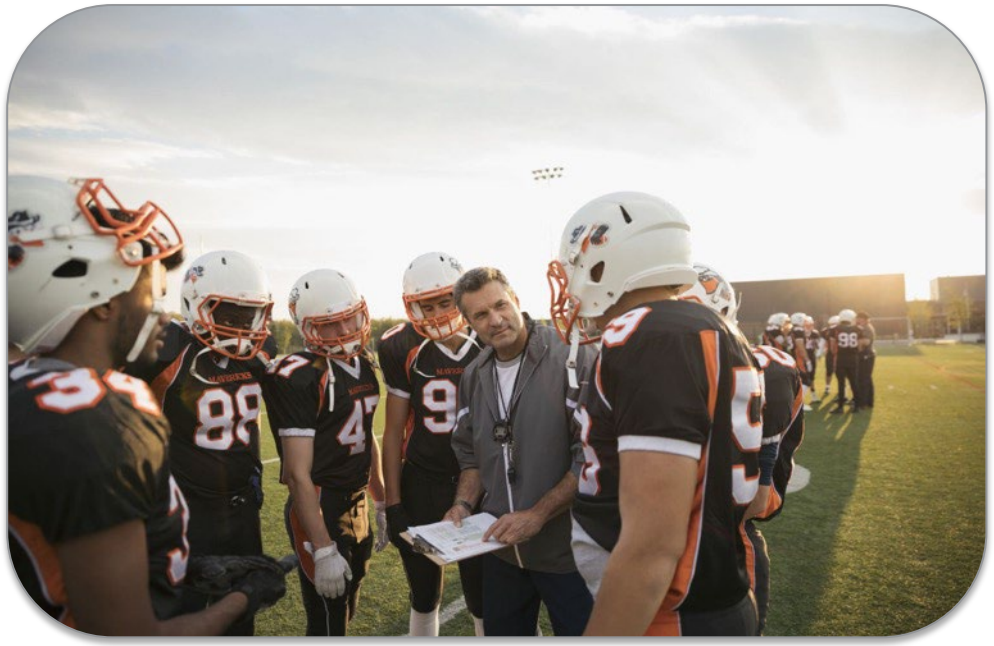
Creating an Internal Compliance Program

- Establish your team:
  - Leadership buy-in
  - Appoint team lead
  - Define roles/responsibilities of each team member



Creating an Internal Compliance Program

- Establish your team:
  - Training
    - Ensure all members understand regulations and compliance goals
  - Launch meetings
    - Use agendas and document minutes/action items
  - Evaluate and Adjust
    - Conduct an annual review of the team's effectiveness

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Creating an Internal Compliance Program

- Keep team size manageable
  - 2-3 for a small facility
  - 3-8 for a large facility
- Rotate responsibilities where possible to build buy-in
- Incorporate standing agenda items
- Ensure follow-up accountability for action items
- Celebrate compliance successes to boost morale

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Sample Questions for your Team



What compliance challenges have we faced recently?



Are policies and procedures clear and being followed?



What additional training or resources do we need?



What upcoming compliance tasks do we need to address this quarter?



How can we improve communication about compliance issues?

Sample Questions for your Team



Are there any risks or concerns we should escalate?



How can we strengthen accountability and collaboration going forward?



What next step can you commit to for strengthening compliance?



How can we continue supporting each other in accountability and collaboration?



What successes can we celebrate as a team?

Compliance	Frequency	Follow-Up Date	Delegation
Oxygen, fire, AED logs			
Collaborative chart audits			
Administrative chart audits			
Patient satisfaction surveys (if applicable)			
Medicare cost report 5 months from fiscal year end			
HR Audit			
Equipment Inspection			
Fire Inspection			
Employee Training			
Medicare Part A Revalidation (RHC)			
Medicare Part B Revalidation (Group)			
Medicaid RHC Revalidation			
Policy Review			
Emergency Plan Review			
Required Exercise			
Exercise of Choice			
Fire/Tornado Drills			
Program Evaluation			
Temperature Logs			
Control Logs			
Organizational Chart			
CLIA			
Sample Med Logs			
Control Med Logs			
Autoclave (if applicable)			

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Goals for Quarterly Compliance Meetings

- Discuss upcoming compliance tasks
- Determine previous quarter's internal progress in completing compliance goals
- Review any RHC program updates
- Encourage open dialogue on challenges and opportunities
- Align priorities for the next quarter



Sample Project

- First meeting:
  - Met with office manager and provider
  - Reviewed all compliance tasks and determined when they were last completed and next due
  - Started a shared google document where we listed out action items before the next meeting
  - Discussed changes to the RHC program and determined impact to clinic (ie. removal of labs)

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Sample Project

- All consecutive meetings:
  - Reviewed previous quarter action items and determined status of each project
  - Determined what was overdue and delegated tasks with new goal date
  - Determined new action items based on compliance checklist
  - Discussed changes to the RHC program (if applicable) and determined impact to clinic

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Performance Improvement

- Proactive
- Self-motivated
- Positive reinforcement
- INTERNAL



Plan of Correction

- Reactive
- Do not have a choice
- Can impact certification if not addressed
- EXTERNAL



Self Audit

- Physical plant
- Chart audit
- HR audit
- Documentation review
  - Policies
  - Emergency plan
  - Collaborative review
  - Program evaluation report
  - Tests (equipment, lab, spore, etc.)



Considerations:

- Cautions:
  - Can you provide evidence?
  - Remove assumptions
- Use a checklist
- Highlight areas out of compliance
- Prioritize tasks
- Assign accountability
- Determine scale of project
- Create buy in

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Areas of Improvement:

- What struggles were identified?
- Is it staffing related?
- Is it process related?
- Brainstorm



Performance Improvement Project

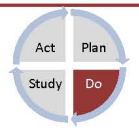
Name of Clinic: _____
Start Date: _____
Completion Date _____
Area of Improvement: _____

Plan:



- *Summary of plan:*
  - *What does the project entail?*
  - *What are the delivery methods?*
  - *We plan to…*
  - *We hope this produces…*
- *SMART Goals: (Specific, Measurable, Achievable, Relevant, Timely)*
- *Action Steps:*

Do:



- *We observed:*

Study:



- *We learned that…*
- *We measured our goal by…*

Act:



- *Conclusion*
  - *Continued improvement needed*
  - *Next steps*
  - *Timeline for implementation*
  - *Goal met?*

Related Documents:

- *Attach evidence*

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Sample Projects:

- It doesn't have to be complicated…
  - Create a new policy
  - Implement a new tool
  - Add a new service
  - Establish a program evaluation
  - Address a new risk
  - Create an internal compliance team
  - Create an evidence binder
  - Streamline a process



Action Steps:

- Conduct a self audit
- Determine areas of improvement
- Set SMART goals
  - Smart, Measurable, Achievable, Relevant, Timely
- Schedule coaching sessions with Tressa/Vicy
- Complete PDSA
- Repeat cycle as needed



2025/2026 Projects:

- Adding a New Service
- TB Testing
- Diabetic Quality Metric Tracking
- Cancer Screening
- Hypertension Quality Metric Tracking
- Sample Medication Protocols
- Improving Follow-Up
- Administrative Chart Audit
- Create Internal Compliance Team
- Monitor Inventory
- Evidence Binder



Lessons Learned:

- Determine scale of project
- Determine resources/team members you have available to accomplish your goals
- Dedicate and prioritize time to complete actions
- Don’t bite off more than you can chew
- Reach out with questions



We want to hear from you…

What successful practices have you implemented to create an internal compliance program?



Thank You

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