



Corporate Compliance Training

February 1 – 2, 2010

Westin Indianapolis
50 South Capitol, Indianapolis, IN 46204
800-228-3000

IPHCA and Feldesman Tucker Present: Corporate Compliance Training

IPHCA has partnered with Feldesman Tucker, Jackie Leifer, and RSM McGladrey to offer our members full two-day training on Corporate Compliance. Thanks to ARRA monies, IPHCA is able to subsidize a large portion of the cost for our members as well as offer the Corporate Compliance Toolkit for each health center (not attendee) that attends the training at no additional cost to you. Information on the training as well as the agenda is below. IPHCA has partnered with the Westin Indianapolis to offer a discounted hotel room rate of \$109 plus tax/per night. The hotel is located in downtown Indianapolis and attached to the Circle Centre Mall for easy access to restaurants and shopping! The **hotel reservation cut-off date is January 11**; please call the 800-number above and ask for the Indiana Primary Health Care group rate. THIS TRAINING IS OPEN TO BOTH STATE FUNDED HEALTH CENTERS AND FEDERALLY QUALIFIED HEALTH CENTERS.

What is a Corporate Compliance Program?

A corporate compliance program is a system of internal controls designed to ensure that health care providers (including health centers) regularly evaluate and monitor their own adherence to applicable statutes, regulations, and program requirements.

What is the benefit of having a Corporate Compliance Program?

- Corporate compliance programs help **to reduce legal and regulatory exposures** (and related investigations) by identifying and preventing illegal and unethical conduct. Health centers are increasingly at risk for fraud investigations which, aside from being expensive to defend, can result in civil and criminal sanctions, monetary penalties and financial recoveries, and/or exclusion from participation in federal health care programs.
- Corporate compliance programs assist a health center's Board of Directors **to meet the legal requirement under the Section 330 implementing regulations** to ensure that the health center is operating in compliance with all federal, state and local laws and regulations. Even though only one State requires Medicaid providers to adopt a compliance program, all States require Medicaid providers (including health centers) to establish written policies and procedures to prevent fraud, waste and abuse.
- **Transparency and accountability** are critical elements of the American Recovery and Reinvestment Act (also known as the Stimulus Act). The Stimulus Act established the Recovery Accountability and Transparency Board to conduct oversight of programs funded by the Stimulus Bill. As some of the earliest recipients of Stimulus funds, health centers should anticipate a high level of scrutiny in regard to use of these funds.

What does the Corporate Compliance Training provide?

A two-day session on developing and implementing effective corporate compliance programs; the program will:

- Describe the seven elements of effective corporate compliance programs;
- Explain the key legal and financial requirements for health centers;
- Explain how to conduct risk assessments, audits and investigations, as well as how to create a compliance program work plan tailored to meet the needs of your health center;
- Include a special Compliance Officer's-only training session;

- Include a compliance training session for board members; and
- Include a two-volume Toolkit DVD that includes sample checklists, form

What will attendees learn from the Corporate Compliance Training?

The curriculum for the two day training is as follows:

- **The New Climate of Accountability, Transparency and Enforcement**
 - ARRA Oversight Activities
 - DOJ/OIG Enforcement Trends
 - Medicaid Integrity Program
 - State Enforcement Trends (e.g., Medicaid Inspector General)
 - Health Center Grant Requirements (Section 330; Federal Grants law; Procurements)
- **Elements of Effective Compliance Programs**
 - Designation of a Compliance Officer or Contacts
 - Internal Monitoring and Auditing
 - Development and Implementation of Compliance and Practice Standards
 - Training and Education
 - Process for Responding to Detected Offenses
 - Open Lines of Communication
 - Disciplinary Standards
- **Legal Requirements for Key Health Center Risk Areas**
 - Fraud (False Claims Act; fraud and abuse laws)
 - Contracts and Affiliations (kickbacks; self-referrals; safe harbor)
 - Federal Programs (340B drugs; Vaccines for Children)
 - Standard of Care (malpractice/ FTCA; credentialing)
- **Financial Requirements for Key Health Center Risk Areas**
 - Billing and Coding (documentation)
 - Grants Management (tracking/reporting data)
 - Internal Controls
 - Information Management (HIPAA security issues)
 - Tax-Issues (990s; compensation)
 - Cost Reporting and Regulatory Filings
- **Implementing Your Compliance Program**
 - Legal Risks of Compliance Programs (privilege issues, document retention)
 - Compliance Risk Assessments
 - Compliance Program Annual Work Plan
 - Compliance Audits and Internal Investigations
 - Governance and Staff Responsibilities of Compliance Programs
 - Communication Tools (education strategies and reporting)
 - Voluntary Self-Disclosures (benefits/risks)
 - Evaluation of Compliance Programs

What is included in the NACHC Corporate Compliance Toolkit?

- The NACHC Corporate Compliance Toolkit consists of a DVD containing two volumes of documents created by the authors and an appendix of relevant publicly available source materials:
 - Volume I – Elements of Effective Compliance Programs
 - Volume II – Legal Requirements for FQHC Compliance
 - Appendix of Relevant Authorities
- Documents include summaries of Relevant Authorities, authors' guidance, and written tools that can be used as a starting point for customizing compliance program policies, procedures, forms, and other documents necessary for the development, implementation, and maintenance of an effective compliance program.

What is the agenda for the training?

Day One

- 9:00 – 9:15 AM Overview of the Corporate Compliance Training
- 9:15 – 10:30 AM Corporate Compliance in an Era of Accountability, Transparency, and Enforcement, *Feldesman Tucker Leifer Fidell LLP*
- 10:30 – 10:45 AM Morning Break
- 10:45 – 12:00 PM Health Center Grant Requirements, *Feldesman Tucker Leifer Fidell LLP*
- 12:00 – 1:00 PM Lunch provided by IPHCA
- 1:00 – 2:30 PM Legal Requirements for Key Health Center Risk Areas – Part 1
Feldesman Tucker Leifer Fidell LLP
- 2:30 – 2:45 PM Afternoon Break
- 2:45 – 5:00 PM Financial Requirements for Key Health Center Risk Areas, *RSM McGladrey Inc*
- 6:00 – 7:00 PM Networking Reception provided by IPHCA (*All Registrants*)

Day Two

- 9:00 – 10:30 AM Implementing Effective Corporate Compliance Programs, *Feldesman Tucker Leifer Fidell LLP and RSM McGladrey Inc*
- 10:30 – 10:45 AM Morning Break
- 10:45 – 12:00 PM Implementing Effective Corporate Compliance Programs
Feldesman Tucker Leifer Fidell LLP and RSM McGladrey Inc
- Compliance Officers – Separate Registration Required*
- 12:00 – 12:15 PM Lunch provided by IPHCA
- 12:15 – 2:00 PM Compliance Officer Training Session
Feldesman Tucker Leifer Fidell LLP and RSM McGladrey Inc
- 12:00 – 2:00 PM Lunch provided by IPHCA
- 2:00 – 3:30 PM HIPAA Security and Red Flags Rule, *RSM McGladrey Inc*
- 3:30 – 3:45 PM Afternoon Break
- 3:45 – 4:45 PM Legal Requirements for Key Health Center Risk Areas – Part 2
Feldesman Tucker Leifer Fidell LLP
- 4:45 – 5:00 PM Conclusion

Cost: **IPHCA Members**

1 attendee: \$375 per attendee
2 – 3 attendees: \$300 per attendee
4 or more attendees: \$250 per attendee
10 or more attendees: \$160 per attendee

****Compare to \$750 per attendee through NACHC!**

****Price includes the manual as well as all meals**

Non Members

1 attendee: \$475 per attendee
2 – 3 attendees: \$400 per attendee
4 or more attendees: \$350 per attendee
10 or more attendees: \$260 per attendee

Attendee Information

For planning purposes, please check all events that you will be attending. There is no extra charge for the Corporate Compliance Officer lunch or the reception.

- Two-day training
- Reception First Night
- Corporate Compliance Officer Lunch

Name

Title

Organization

E-Mail

Address (Street, City, State, Zip)

Payment Amount

Payment Type

Check (enclosed)

Visa

MC

Credit Card Number

Expiration Date

Signature of Card Holder

Please send form to:
Stephanie Suddeth
IPHCA
1006 E. Washington Street
Indianapolis, IN 46202

or fax to 317-630-0849.