

Boot Scootin' Compliance Boot Camp

**How to Lasso Your Leaders into Becoming
Compliance Champions**

Rooster Session

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Compliance Boot Camp Overview

Wrangling Leaders: Objectives

- Saddlebags: Toolkit Materials
- Corralling: Delivery Methods
- Snakes and Storms: Education Pitfalls and Learnings

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Creating a Plan

High Risk

Executive Leadership buy-in

Physician Leadership buy-in

Schedule with already scheduled meetings

Set expectations

Circle back with leadership for course correction



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Campfire Discussion:

What issues would you like your organization's leadership to identify and report?



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Boot camp topics



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Week	Continuing Topics / Communications
1	Non-Discrimination
2	Harassment Free Workplace
3	Use of Intermountain Equipment and Supplies
4	Drug Diversion
5	Conflicts of Interest
6	Licensure / Scope of Practice
7	Conditions of Participation / Reporting Relationships
8	Reporting to External Agencies
9	Consents
10	EMTALA
11	False Claims / Whistleblowers
12	New Ventures and Outreach

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Campfire Discussion:

How do you educate your leadership about these concerns?



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Pitfalls: What happens when you end up in a field of thorns?



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Campfire Discussion:

How do you know if your boot camp is effective?



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Example of Boot Camp Materials

- Invitation Letter (meeting attendance required)
- Boot camp content
 - Stories tied to topics
- Bi-weekly follow-up content
- Employee newsletter / Provider newsletter


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Bi-weekly follow-up content



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Bi-weekly follow-up content



What you need to know!

Non-Discrimination

Intermountain Healthcare complies with applicable federal and state civil rights laws and as an organization does not discriminate against any individual on the basis of the following:

Age	Race	Color
Ethnicity or national origin	Religion	Culture
Language	Physician or mental disability	Socio-economic status
Sex	Sexual orientation	Gender identity or expression
Veteran status	The ability to pay	

Intermountain also provides freedom from retaliation and humiliation.

Examples of discrimination of patients, visitors, members and guests include, but are not limited to:


- Refusing to accept a patient with a disability (e.g., diabetes, obesity, hearing or sight impairment)
- Not providing interpretation assistance or refusing to see patients who speak a different language
- Refusing to allow a service animal to accompany a patient or guest
- Unequal access to care or refusing to provide treatment for individuals with HIV / AIDS
- Refusing to address an individual by their expressed gender identity, name and/or pronouns

Scenario: Use Voting Button to Select Correct Response (Options / Use Voting Buttons)

- During a patient visit, the patient asks for an on-site interpreter. What should you do?
 - A: Ask the patient to reschedule the appointment.
 - B: Request an on-site interpreter to provide communication services based on what method serves the patient best.
 - C: Tell the patient it would take too long to get an on-site interpreter and for this visit they will have to use telephonic interpretation.

Resources:

[Communication Assistance Policy](#)
[Compliance Communications - Language Services - Communication Assistance](#)
[Compliance Communications - Non-Discrimination Non-Retaliation](#)
[Language Services Website - Request an Interpreter](#)
[Non-Discrimination Policy](#)



What you need to know!

False Claims Act

The False Claims Act is a federal law that makes it a crime to **knowingly** file a false or fraudulent claim for payment from government payers.

Knowingly Means:

- An individual has knowledge a claim is false and have not reported or corrected the error.
- An individual deliberately adds false information or deliberately ignores errors on the encounter or claim or both.
- An individual disregards registration, charging, coding, billing, auditing, posting and collection regulations and rules causing the encounter or claim or both to have erroneous information.

If you have or should have knowledge of an overpayment, you are required to correct the payment with the payer.
 A penalty up to \$11,000 plus damages can be assessed per false claim.

Scenario: Use Voting Button to Select Correct Response (Options / Use Voting Buttons)

You overhear a conversation in the hallway. A provider says to another provider that she is so busy she is documenting services and procedures that did not take place. You are concerned that the false documentation is leading to false charges.

You should:

- A. Ignore it, it seems this caregiver is doing the best she can.
- B. Do what the caregiver is doing. Sounds like a great way to get some 'me time'.
- C. Report the concern to Compliance.

Resources:

[False Claims Prevention Procedure](#)
[False Claims Prevention Policy](#)
[Community Care and Clinic False Claim Act Policy](#)
[Claim Overpayment Policy](#)

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Boot camp content

Compliance Resources (including PPGs)

Reporting Guidance

Consistency

High-risk areas:

- Privacy/Security
- Stark and AKS



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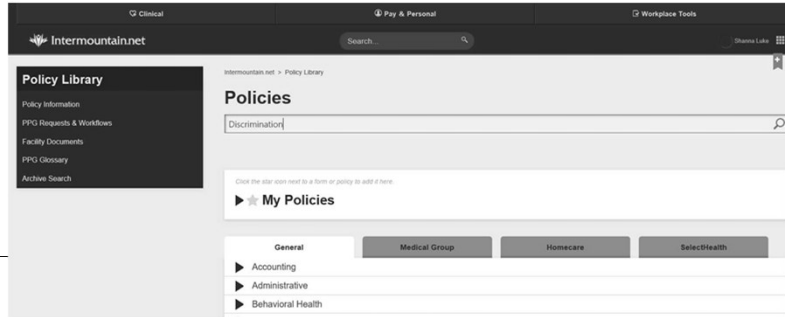
Compliance Resources

A screenshot of the Intermountain.net website's Compliance Resources page. The page features a dark navigation sidebar on the left with a 'Compliance' menu. The main content area has a 'Compliance' header and a large 'Report a Compliance Concern' button. Below this is a paragraph of text and three small image-based links for 'Conflict of Interest', 'Code of Ethics', and 'Law Enforcement Protocol'. On the right, there is a 'Compliance Hotline & Reporting' section with a photo of a bulldog and text explaining the reporting process and Intermountain's non-retaliation policy.

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Policies, Procedures and Guidelines

- Policies governing specific topics
- Behavioral Expectations
 - Code of Ethics



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Search Results

Discrimination

About 11 results

Non Discrimination Policy

Policy Library

Intermountain Healthcare complies with applicable federal and state laws and does not discriminate against any individual on the basis of age, race, color, ethnicity or national origin, religion, creed, language, disability, socioeconomic status, sex, sexual orientation, gender identity or expression, and/or veteran status.

Discrimination Grievance Procedure

Policy Library

This procedure describes how individuals who believe they have been discriminated against on the basis of ethnicity or national origin, religion, creed, language, disability, socioeconomic status, sex, sexual orientation, gender identity or expression, and/or veteran status may file a grievance.

Non-Discrimination Harassment Retaliation Free Workplace Policy

Policy Library

Non Discrimination Policy

Intermountain Policy

Description

Intermountain Healthcare complies with applicable federal and state civil rights laws and as an organization does not discriminate against any individual on the basis of age, race, color, ethnicity or national origin, religion, creed, language, disability, socioeconomic status, sex, sexual orientation, gender identity or expression, and/or veteran status.

URL

[https://m.intermountain.net/policy/Pages/detail.aspx?docid=050037&title=Non Discrimination Policy](https://m.intermountain.net/policy/Pages/detail.aspx?docid=050037&title=Non%20Discrimination%20Policy)

Category

Policy

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Reporting Guidance

- When to notify Compliance
- How to notify Compliance
 - Hotline
 - Area Compliance Officers
 - Online Reporting
 - Escalation of Concerns
- Non-Retaliation



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Healthcare

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Mechanisms to Report Concerns

Situation	Resources/Contacts
Work Environment	<ul style="list-style-type: none"> • Human Resources (Harassment) • Corporate Safety and Health • Compliance Hotline (800) 442-4845
Clinical	<ul style="list-style-type: none"> • Your immediate supervisor • Facility Chain of Command • Nursing Administration or Clinical Service Administration • Compliance Hotline (800) 442-4845
Medical Staff Concerns	<ul style="list-style-type: none"> • Your physician leadership • Your Medical Director • Your Clinical Program Leader • Your Hospital or Medical Group Administrator • Intermountain Physician Relations (801) 442-2840 • Compliance Hotline (800) 442-4845 • Suzie Draper, the Corporate Compliance Officer: <input type="text"/>
Release of Patient Information	<ul style="list-style-type: none"> • Health Information Management • Privacy Coordinators • Region/Division Compliance Teams • Compliance Hotline (800) 442-4845
Questions on Laws, Regulations, Policies and Procedures	<ul style="list-style-type: none"> • Your immediate supervisor • Region/Division Compliance Teams • Legal Department • Compliance Hotline (800) 442-4845

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Consistency

- Discipline
 - Based on Intermountain's relationship with the individual
 - Employee – Includes employed providers on the medical staff
 - Affiliated Providers



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Case Scenario

A report comes in that a physician is creating a 'hostile work environment'. The report shared is that the physician is "verbally abusing staff, by yelling and using derogatory statements."



What more information do you need before proceeding?

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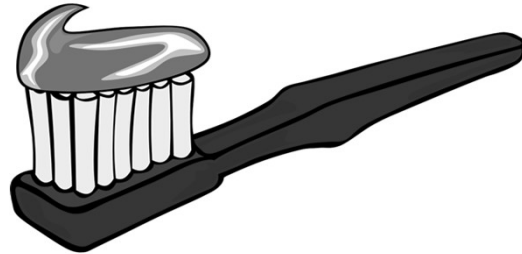
Privacy and Data Security



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Sharing Credentials

- Passwords
- Badges



Case Scenario

A physician is preparing a presentation for a national conference. You receive a request from the physician to use Intermountain data to show process improvement.



What are concerns that should be reviewed and addressed?

Stark and Anti-Kickback



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Leases

- Use of Intermountain space or equipment



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Case Scenario

A physician works with Intermountain APPs to provide services to patients in the hospital. You receive a report that the physician is using the APP's documentation to bill for services.

What are concerns that should be reviewed and addressed?



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Discussion

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