Making the Most of Mandatory:
Best Practices for Healthcare
Compliance Training
and Communications

Presented by

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What We're Going to Cover

1 The Adult Learning Theory

2 Applying the Principles

3 Lessons Learned

Disclaimer: Nothing in this presentation should be construed as legal advice nor relied upon as legal expertise.

1
The Adult Learning Theory

Objectives

1. Describe Malcolm Knowles' work on Adult Learning Theory

    5 assumptions of adult learners

    4 principles of andragogy

2. Applying these assumptions and principles to adult learners in compliance training   5

Malcolm Knowles

In the 1980s the American educator, Malcolm Knowles, described assumptions and principles of adult education, or andragogy, as opposed to pedagogy for younger persons.

Knowles, M. (1980). The modern practice of adult education: Andragogy versus pedagogy. Rev. and updated ed. Englewood Cliffs, NJ: Cambridge Adult Education.

Knowles, M. and Associates (1984). Andragogy in action: Applying modern principles of adult learning. San Francisco: Jossey-Bass.

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Malcolm Knowles

Knowles, M. (1975). Self-directed learning: A guide for learners and teachers. Chicago: Follett Publishing Company.

See also:
Kearsley, G. (2010). Andragogy (M.Knowles). The theory Into practice database. Retrieved from http://tip.psychology.org

https://elearningindustry.com/the-adult-learning-theory-andragogy-of-malcolm-Knowles, Accessed May 2, 2016

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Knowles' 5 Assumptions of Adult Learners

1 Self-Concept

2 Adult Learner Experience

3 Readiness to Learn

4 Orientation to Learning

5 Motivation to Learn

See https://elearningindustry.com/the-adult-learning-theory-andragogy-of-malcolm-knowles Accessed May 2, 2016

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1. Self-Concept

As a person matures his/her self concept moves from one of being a dependent personality toward one of being a self-directed human being

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2. Adult Learner Experience

As a person matures he/she accumulates a growing reservoir of experience that becomes an increasing resource for learning.

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3. Readiness to Learn

As a person matures his/her readiness to learn becomes oriented increasingly to the developmental tasks of his/her social roles.

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4. Orientation to Learning

As a person matures his/her time perspective changes from one of postponed application of knowledge to immediacy of application, and accordingly his/her orientation toward learning shifts from one of subject centeredness to one of problem centeredness.

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5. Motivation to Learn

As a person matures, the motivation to learn is internal.

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Knowles' 4 Principles of Andragogy
(adult learning)

1. *Adults need to be involved in the planning and evaluation of their instruction.*

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Knowles' 4 Principles of Andragogy
(adult learning)

2. *Experience (including mistakes) provides the basis for the learning activities.*

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Knowles' 4 Principles of Andragogy
(adult learning)

3. *Adults are most interested in learning subjects that have immediate relevance and impact to their job or personal life.*

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Knowles' 4 Principles of Andragogy
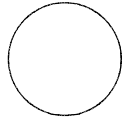(adult learning)

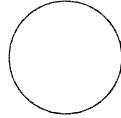4. *Adult learning is problem-centered rather than content-oriented.*

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2
Applying the Principles
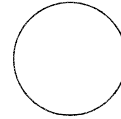
This is Me.

- Compliance

- Training

- Diversity & LGBTQ Business Resource Group

Hat 1

Hat 2

Hat 3

Certifications

CPLP – Certified Professional in Learning & Performance
  - **ATD Certification Institute**
    - **https://www.td.org/certification/cplp/introduction**

CHC – Certified in Healthcare Compliance
  - Health Care Compliance Association
    - **https://www.compliancecertification.org/CHC/CertifiedinHealthcareCompliance.aspx**

What are the Foundations of Learning & Performance?
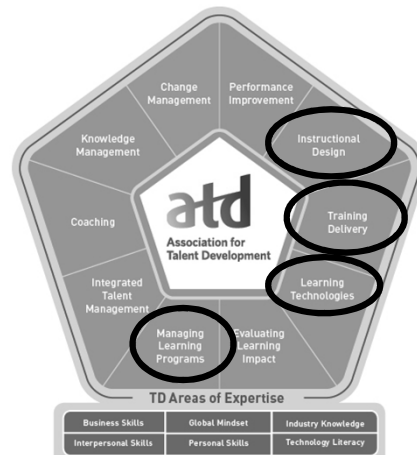
What are the Expectations for Compliance Course Completion?

- Meeting Regulatory Requirements
- Maintaining Accurate Documentation
- Reinforcing Training with Related Communication and Support
- Enlisting senior leadership and directing managers to help drive completion
- Ensuring relevance of training curricula and reinforcement

What are Some Best Practices for Compliance Course Completion?

- Manage expectations and deadlines.
- Think outside the box.
- Leverage communications: Announcements, Emails, Reminders, Brochures/Cards, Videos, Plasma Screens.
- Regularly review and refresh New Hire Orientation, especially for different audiences.
- Work with business partners to develop targeted training.
- Use Compliance Week to promote the value of Compliance training and to drive completion.
- Launch Annual Compliance Training in Phases throughout the year.

A Three-Year Plan:
Years 1 & 2 (Training & Communication)

2017	Building the Infrastructure for Enhanced Communications & Training
	Implement Training and Communication Plans for 2017
	Refresh New Hire Orientation Overviews as needed
	Terminate Vendor Contract (expires in November):
	✓ Send out RFPs in June, with direction from Procurement
	✓ Award of New Compliance Training Vendor by October 31
	Communications Initiatives:
	✓ Compliance Re-branding
	o Revised Compliance eNet site
	o "Compliance Starts with You" Mission/Value Card
	Seek to align with our other companies, whenever possible
	Develop strategic plans for 2018
2018	Implementing an Enhanced Communications & Training Program
	Integrate with Compliance Programs across the enterprise
	Implement a robust Compliance Communications and Training Program, including increased use of video and other formats
	Refresh the Compliance eNet site
	Share best practices through presentations at Conferences, blogs
	Increase visibility of Corporate Compliance priorities and solicit feedback via enterprise-wide site visits
	Revise Standards of Conduct Handbook (2018), eNet version
	Launch Compliance Program Effectiveness Survey (use as baseline): Partner with Regulatory
	Develop enterprise-wide, strategic plans for 2019

A Three-Year Plan:
Year 3 (Training & Communication)

2019	Measuring an Enhanced Communications & Training Program
	Maximize partnership with new training vendor
	Re-format and revise printed version of SOC Handbook, following industry best practices/benchmarked companies
	Share best practices through presentations at Conferences, blogs
	Develop measurement and evaluation tools for Compliance training, including ROI: (**http://www.kirkpatrickpartners.com/OurPhilosophy/TheKirkpatrickModel**) **The Kirkpatrick Model:** **Level 1: Reaction:** The degree to which participants find the training favorable, engaging and relevant to their jobs **Level 2: Learning:** The degree to which participants acquire the intended knowledge, skills, attitude, confidence and commitment based on their participation in the training **Level 3: Behavior:** The degree to which participants apply what they learned during training when they are back on the job **Level 4: Results:** The degree to which targeted outcomes occur as a result of the training

A One-Year Training Launch Plan

Project	Dates	Comments
Launch Phase 1 courses on New Training Platform • CMS' Medicare Parts C and D General Compliance Training • CMS' Combating Medicare Parts C and D Fraud, Waste and Abuse • HIPAA Compliance, Privacy and Security	**Launch: Sept. 4** **Due: Oct. 12**	Prior to launch course content will be finalized and all testing, file transfers and all other IT scenarios/issues will be completed by Compliance, HR, new vendor, and IT.
Launch Phase 2 course on New Training Platform • EmblemHealth Standards of Conduct, which will include an attestation for the revised 2018-2019 Standards of Conduct Handbook	**Launch: Nov. 1** **Due: Dec. 3**	Prior to launch course content will be finalized and all testing, file transfers and all other IT scenarios/issues will be completed by Compliance, HR, new vendor, and IT.
Collaborate with IT/IS on launch of Information Security e-learning course	**Q4**	
Provider-based Company: Review Compliance Training Curricula, revise course content, and develop launch schedule	**Launch: Sept. 10** **Due: Nov. 10**	Work with Corporate Compliance Officer and HR Shared Services.

A Sample Training Launch Announcement

COMPLIANCE

Launch of 2018 Mandatory Compliance Training — Phase 1

On **September 4**, we will launch Phase 1 of our 2018 Mandatory Compliance Training, with the following courses:

- Medicare Parts C & D General Compliance Training
- Combating Medicare Parts C & D Fraud, Waste and Abuse
- HIPAA Compliance, Privacy and Security

The deadline for completion is Friday, October 12.

As always, you must review each course in its entirety and achieve 100 percent on the final quiz to complete and receive credit for each course.

Please review these instructions on how to access the training. Read them before you begin and keep them handy.

Your course assignment email will be sent on **September 4**. This and all other emails regarding course completion will be auto-generated directly from our new vendor, not sent from *this* Compliance mailbox.

Compliance Training — Phase 2
We will launch Phase 2 of Compliance Training on **November 1**, with a due date of **December 3**. This phase will have only one course — EmblemHealth Standards of Conduct — which will include an attestation for the revised 2018–2019 Standards of Conduct Handbook.
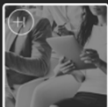
Questions?
For general questions about Compliance Training, email the Compliance Training mailbox. For any technical questions, email our new vendor's Help Desk..

Course Access Instructions Provided by Technology Partner

(H) Healthicity

Step 5:
To begin a course, simply click on the course you'd like to begin and select the Start this Course button.

CMS Combating Medicare Parts C & D Fraud, Waste and Abuse

Start this course

0%

Modules   Reviews

Questions

For any technical questions, please contact the Healthicity Support Team at support@healthicity.com or by phone at 877-777-9963.

Now for the Fun Part……

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Lessons Learned

My Vantage Point

- Work with a team including the Chief Corporate Compliance Officer to design and review training and education;
- Assist in coordination, development and rollout of training and education (new hire and annually) of over 60,000 employees, consultants, affiliated medical staff, students and volunteers;
- Work with all levels in departments including HR, training, IT, medical staff offices, volunteers and students;
- Work with an expansive electronic learning management (ELM) platform;
- Did it on a small scale of 135 staff and now the above.

Here are some lessons learned and how to adapt to environments in flux…

Recognize this?

Under NYCRR 18 Part 521.3 (c), compliance programs shall include certain elements which include the following:

Training and **education** of all affected employees and persons associated with the provider, including executives and governing body members, on **compliance issues, expectations** and the **compliance program operation**; such training shall occur periodically and shall be made a part of the orientation for a new employee, appointee or associate, executive and governing body member.

Lessons Learned: Re-Focus

- Are we training or are we educating?
- What do we consider "associated persons"? - the more the merrier?
- Who is our audience? – What are we trying to accomplish?
- What are our jobs and how do we tell people?
- Complicated or Not?
- FAC's 90/5/5 Rule (pending copyright)

Lessons Learned: Things to Consider

Things to consider as we move forward in our unending quest to train and educate….

- Learn your ELM…if you don't have one…then?
- Evaluate your audience and develop training around that;
- Revised KISS methodology?;
- Utilize the news;
- Evaluations?
- Don't let it get stale;
- Use the one week a year we have for ongoing education;
- Monitor your records;
- Utilize "If at first you don't succeed"…

Questions?

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