Office of Inspector General (OIG) Compliance Module
Implementation Instructions

This guide will direct your team in the steps necessary to work through the modules to implement OIG compliance into your practice. These instructions will outline the process and the recommended sequence of steps to best utilize the materials provided. This product should not be interpreted as being all inclusive of every step necessary for a viable compliance program. However, this overview and these instructions will prepare your team to properly install the Eight Steps of the OIG Compliance Program. You can expect the following learning objectives and outcomes upon completion of these modules:

- Knowledge and application of the guidance from the OIG of the Department of Health and Human Services (HHS) regarding the OIG Compliance Program for Individual and small-group physician practices.
- Appropriate review of the current state of compliance policy and procedure in the practice.
- A clear understanding of the differences and relationship between written policy and procedure (SOP).
- Basic training on the components of the compliance program and how it should be applied to the practice.
- A properly-conducted compliance meeting with all team members to begin the program.
- Assign a Compliance Officer (CO) for the practice who is aware of their required duties relative to compliance.
- Agreement among all team members to adhere to the practice’s Code of Conduct.
- Documentation of your decision making about compliance policy related to billing, coding, documentation, utilization, patient finances and other pertinent policy in your office.
- Customized compliance policy related to billing, coding, documentation, utilization, patient finances and other pertinent policy in your office.
- A completed baseline audit of your practice and documentation to establish a reference point of the beginning of your compliance program to verify documented improvement and quality in the practice.
- A scheduled process of ongoing auditing and monitoring to ensure continued improvement.
- A fully installed OIG Compliance Program, ready to become a part of your everyday operations.

Congratulations! You’re taking the first, and most important step in bringing required compliance to your practice. We have simplified this program to make it easy to follow in a logical fashion. Simply follow the steps provided, review the materials as directed, train staff members per instructions and you will find that creating and installing this commonsense program can be accomplished quickly and easily. Remember, through your KMC University subscription, you have access, not only to these specialty compliance modules, but also the general KMC University Library covering a wide variety of reimbursement and compliance topic that will be supportive and relevant to your practice and this installation process.

This implementation program is designed to be following in a modular process. In your online training materials, the program of study is set by topic and training concept. Each training concept has an instructional implementation guide (IG) that will walk you through the steps to completion. As you begin each concept, start by downloading and/or printing the IG so that you can follow the steps and check off each item as it is finalized. At the bottom of each IG, there is a space for authentication to sign off that this portion of the installation is completed. We recommend that you keep these completed IGs as a part of the program documentation.

Become Familiar with Your Resources

Your training concepts are made up of various types of resources. The video resources are available to you as long as you are subscribed to this program, as they are hosted on our website only. All other tools are available to download and retain for your practice use. We recommend that you create a digital location within your computer or, better yet, network drive, where you will house all the materials that you are supplied with through this program and that you personalize for your practice. Some practices elect to create a digital copy of their final program manual and keep a
separate resource file of all the reference materials used in the creation process. These items serve as excellent support material for your practice and team.

The following descriptions outline the types of resources found in this process and how each is meant to be used:

**Implementation Guides (IG):** A step-by-step, chronologically ordered tool that walks you through every component of a training concept to accomplish a desired set of outcomes. These are found at the beginning of every training concept and are meant to be followed in a step-by-step fashion. At the bottom of each compliance-related IG, you will have the opportunity to sign and authenticate that the concept is complete. These should be saved for documentation. In the general section of the KMC University Library, you will also find IGs for each training concept, however they do not include the authentication at the end.

**Rapid Tutorial (RT):** A training webinar or video specific to a particular topic. You will usually find an overview RT at the beginning of each concept to set the tone for that training. We strive to keep each RT no more than 30 minutes in length. Occasionally, something is so important that it might be longer, but the times are listed with each RT to assist you with planning your training time.

**Quick Byte Concept (QBC):** A webinar or video training that is less than 5 minutes.

**Fact Sheet (FS):** A single- or multi-page informational document that further clarifies a fact, point or detail on a particular subject. They often include a reference to policy or law, and can include the actual link to a web page containing the explanation. They are written and produced by KMC University.

**Support Tool (ST):** Any form, whether Word, PDF, Power Point, Excel, etc. that has been produced by KMC University to assist an office with implementation of a lesson.

**Reference Tool (RT):** Unlike the RT that refers to a Rapid Tutorial, a webinar or video, this RT refers to a specific resource. It can be a form, document, image or other tool, usually NOT produced by KMC University, that clarifies a point of interest in a lesson. They are often official guidance provided by a governing entity, such as Medicare or a carrier. We provide them for educational support, and they are meant to be stored in an electronic or physical reference manual for your use. These RTs are regularly updated by the entities and KMC University strives to keep them current for our clients’ use.

**Pop Quiz (PQ):** We occasionally use PQs as a lesson check during a training concept. This brief quiz allows the learner to pause and confirm comprehension of a new concept. You will be directed to an online assessment that will immediately send your results by email. This process allows the learner to verify understanding of the concept.

**Quick Questionnaire (QQ):** A form-based questionnaire that assists a practice with a decision making or research process. These short exercises are meant to walk you through a series of steps that will support the training concept with a personalized outcome and guide your next actions.

**Standard Operating Procedure (SOP) Template:** SOP is a critical part of your compliance program. Throughout this training, you will be directed to write personalized process for the important steps of your daily operations. The support lessons throughout the general KMC University Library include sample SOP templates by topic to assist you with writing your SOP. As you begin the lessons on policy and procedure, be sure to visit the various training concepts throughout the general Library to find sample SOP for topics like documentation, billing and coding to personalize for your office.

**Sample Policy (SP):** The foundation of your OIG Compliance Program is the policy that you create and install for your practice. KMC University has provided recommended sample language, contained in an editable, digital format for you to customize. These samples are meant to be reviewed and personalized for your specific office environment. Because every office is unique, you must take this recommended policy and make it your own. In fact, you will find areas of your practice necessitating policy for which we have not provided samples. You’re expected to create and enforce whatever additional policies are relevant for your practice.
Let’s Get Started

By now, you should have had, or are scheduled for, your Library Orientation where one of the KMC University specialists will walk you through your materials and the benefits of your membership, and how to get assistance when you need it. If for any reason this orientation has not happened, or you are not scheduled for it, immediately e-mail helpdesk@kmcuniversity.com to request this right away. After working with hundreds of practices in the OIG Compliance Implementation process, we have established best practices for the most efficient and effective steps for success. In order to maximize the time invested in this process, please follow the steps below, in order, to have the best outcomes.

- **Step One**: Be sure that you’ve found your electronic materials in the KMC University Library. When you log in, you’ll be taken to your dashboard with the colored cubes that are sorted by topic. The specialized compliance materials that are associated with your upgraded membership are found here. Your membership also includes access to the foundational KMC University Library with materials that are housed there as well. As you work through your compliance program creation, you may need to refresh yourself or learn more about a topic for which you’re customizing policy and procedure. Remember to visit the other areas of the library to find additional supportive training materials as necessary.

- **Step Two**: Become familiar with all the ways we can help and support you as you work through this process. You have access to the 24/7 HelpDesk by e-mailing helpdesk@kmcuniversity.com with your questions along the way. Also, a specialist is available every day at our Live HelpDesk between the hours of 12 p.m. and 3 p.m. every weekday to assist you. Call (855) KMCUNOW for immediate assistance during those hours. You can also ask for more detailed help by purchasing a consultation with a specialist who can review your work, help you get past a difficult section or support you specifically as you work the process. You can purchase that online or contact us at 855-TEAMKMC.

- **Step Three**: You will receive, or have already received, a package from KMC University that contains your HIPAA and OIG manuals with your personalized covers and tabbed dividers. These binders will house the work that you create as you work through your online training in a module-by-module approach. Watch for them to arrive, if they haven’t already, and be sure they are routed to whomever is working on this process. Remember, you may decide to keep your compliance program manuals in an electronic form rather than in the binders. That is your choice. We recommend you consider doing both; keep your active program in the manuals and an electronic copy saved in an online format as originals ready to be edited if necessary.

- **Step Four**: In order to make the most of your membership and experience with creating and/or updating your OIG compliance program, strive to set a schedule of goals to meet along the way to keep you on track. We recommend that each office devotes at least 4-8 hours per week to work on this program to keep the momentum moving forward. Of course, once the programs are installed, you’ll notify us that you are ready to drop down to our Basic Library membership for additional training and to maintain and update your compliance programs. One team member, working diligently according to the schedule above, should be able to get through these installations within a couple of months. Set your schedule or milestones now.

**Begin Your OIG Compliance Program Installation Now**

- **Step Five**: The OIG Compliance Program is divided into three separate topics of information, with training concepts included in each. Each individual training concept has its own Implementation Guide (IG) that will guide you through the steps of that concept. Always begin each training concept by downloading and reviewing that IG and work through it like a checklist. At the end of each is an opportunity to sign off and attest to the training and implementation. These can be saved as proof of your ongoing compliance efforts.
Step Six: Begin working through the first training classroom, Compliance Overview, where you will lay the groundwork and learn the basics of policy and procedure. These should all be completed before you move forward with any further actions for the compliance program. Work on these foundational lessons now. When these are complete, move on the Step Seven.

Step Seven: The next training classroom, Create and Install Your OIG Compliance Program, represents the required eight elements of an OIG Compliance Program and will guide you through the installation process itself. These concepts each represent a function that must be performed in your office and collectively represent the oversight of daily operations. Work on these lessons for the bulk of your implementation now. When you’ve completed each of these steps, move on to Step Eight.

Step Eight: The final group of concepts contained in the training classroom, Be the Compliance Officer, direct you in the fulfillment of the necessary actions that must occur on an ongoing basis. Although compliance is everyone’s responsibility, this training topic outlines the duties that the CO will be primarily accountable for. This is perhaps the culmination of your efforts at installing the processes. These training concepts direct you to use the processes you have installed to monitor and address compliance matters. The process of conducting a baseline audit will be accomplished in this section. If you would like assistance with this process, as the training concept indicates, KMC University can conduct this baseline audit on your behalf. Be sure to contact us for more information on this.

Step 9: The final training topic, Install All Policies, is the one that contains all the sample policies that we’ve put together that may be applicable in your office. They are intended to be personalized for your office and customized according to your practice and your needs. They are NOT intended to be used ‘as is.’ They must be reviewed and it’s OK if you don’t use every policy. You may not need to include one or more because of the nature of your practice. When you finalize this last training concept, be sure you hold a training meeting to allow all team members to become aware of the policy and to sign off on the fact that they have been trained and will be accountable to observing this policy and procedure. The checklist included in this lesson will ensure that you don’t miss a step.

Viola! You did it! When all of these training concepts are completed, you have effectively created and installed your OIG Compliance Program. When you’re satisfied that you’ve completed all the materials, contact KMC University to convert to our Basic Library membership to continue your training in other areas, to retain access to our HelpDesk and to conduct ongoing maintenance of your program. As a final action step, consider scheduling a final consultation with one of our specialists to review your completed program for accuracy and completion. Congratulations on taking your practice to the next level of compliance!