

**Better Health for Northeast New
York Performing Provider System
(BHNNY PPS)**

**Compliance Training
Instructional Webinar**

Presented by:

**Noel Hogan, Ed.D, CPA, Sr. Vice
President and Chief Compliance
Officer for Albany Medical Center
and BHNNY**

**Todd Faubel, MBA Compliance
Officer, BHNNY**

August 19, 2017



Introduction

- This webinar is intended to explain why we are required to complete the Annual BHNNY PPS Compliance training, What the compliance training covers, where to find the compliance training, and how to report the completion of the compliance training to the PMO.
- **THIS WEBINAR IS NOT THE COMPLIANCE TRAINING!**

BHNNY's obligation to provide training is a NYS DSRIP DOH requirement

- 18 NYCRR 521.3(c)(3) (Element #3) requires “training and education of all affected employees and persons associated with the provider (PPS Lead)” on the compliance program. Those determined to be “affected employees and persons” may be different during different phases of DSRIP implementation. It is up to the PPS Lead to undertake a reasonable analysis to identify who is “affected” and provide training and education accordingly. While the PPS Lead is responsible for the training and education on its compliance program, the PPS Lead is not required to provide the training and education itself.

Annual Compliance Training/New Employee Training

- What is the difference?
- All new hires and transfers that are considered “affected persons” are required to complete compliance section of the DSRIP 101 training.
- All “affected persons” are required to complete the BHNNY annual DSRIP Compliance training requirement.

BHNNY PPS Compliance Training Video

- Compliance Training elements:
 - ✓ Using the PPS website as a resource
 - ✓ Effective Compliance Programs
 - ✓ Selected Fraud & Abuse laws
 - ✓ Protecting patient privacy
 - ✓ Reporting potential compliance concerns

Affected Person:

All persons associated with a provider who provide items or services, medical direction, referral or prescription including:

- ***its executives and its governing body members; Corporate Officers and Board of Directors***
- ***employees, contractors, subcontractors or volunteers;***

other persons associated with the provider "including performing providers within the PPS network" or members of its medical staff; working in any capacity where NYS DSRIP payments are sought.

Each Partner Organization is responsible for identifying all persons and parties under their direction, supervision or control, or who otherwise directly or indirectly supports activities funded by the NYS DSRIP program submitted by Albany Medical Center Hospital and its Partner Organizations.

These activities may extend to providers' operations other than just billing and payments. At a minimum, participating organizations should consider persons and parties who conduct activities in support of the DSRIP program and responsibilities articulated by any executed Partner Organization Agreement and Master Project Agreement including, but not limited to:

billings; finance staff

payments; finance staff

medical necessity and quality of care; clinical team

governance; officers and Board members

mandatory reporting; anyone reporting to the PMO

credentialing; and

other risk areas that are or should, with due diligence, be identified by the provider or partner organization .

Attesting to training completion

- Your Compliance Officer or the person within your organization that has the authority must complete the BHNNY PPS Sign in sheet and Attestation Form

How to Report on training completion

- The BHNNY PPS Sign-in/Attestation form must be submitted through the Movelt system.
- If you are not set up with Movelt please contact our PMO at 518-264-3460 for Movelt registration instructions.

- The BHNNY Annual Compliance training must be completed by **9/30/16**.
- Completed Sign-in Attestation forms are due to the PMO by 10/10/17.

- Completion of the Annual BHNNY Compliance Training is a contract requirement.
- You must complete the Annual Compliance Training in order to continue participation in any BHNNY DSRIP activity or initiative.

Where to locate the training and materials

<http://bhnnnypps.org/>

Committees tab

Audit and Compliance tab

Bottom of the page, click on additional documents

1. The compliance training video YouTube link
2. The slides and narrative associated with the compliance training video
3. The BHNNY PPS Sign-in Attestation Form
4. The slides from this presentation

Contact information:

- Noel Hogan, Ed.D, CPA, Sr. Vice President & Chief Compliance Officer for Albany Medical Center and BHNNY

hogann@mail.amc.edu

518-262-4692

- Todd Faubel, MBA, Compliance Officer - BHNNY

faubelt@mail.amc.edu

518-264-4967

Q & A