



## STRATEGIC MANAGEMENT SERVICES COMPLIANCE CONSULTING

# Compliance Program Effectiveness Reviews

The U.S. Department of Health and Human Services Office of the Inspector General (OIG) states that organizations should conduct ongoing auditing and monitoring of compliance programs to ensure effectiveness. The OIG also recommends that compliance programs periodically undergo an independent review to verify that program operations are running as effectively as possible. Strategic Management offers a **collaborative, phased compliance program review process** to identify and verify the existence and effectiveness of key elements of a compliance program.

Strategic Management's Compliance Program Effectiveness Reviews include an in-depth analysis of your compliance program to establish its current status and needs. Our proprietary **Comprehensive Compliance Program Evaluation®** protocol contains elements from the U.S. Sentencing Commission (USSC) Sentencing Guidelines and OIG compliance program guidance documents.



Strategic Management reviews existing compliance documents, evaluates program operations, and conducts on-site and remote interviews for a complete 360° review of the compliance program. Strategic Management also assesses your program for evidence to support the USSC and OIG's seven elements of an effective compliance program by examining regulatory requirements, industry best practices, and enforcement trends. Our extensive experience with healthcare operations enables us to provide proven best practice recommendations for compliance operations to our clients.



Strategic Management conducts interviews with key Board members, executives, managers, and focus groups, and employs metrics to ensure effective operations and analysis of high risk areas. Strategic Management also conducts ancillary site visits, deploys surveys, and works directly with the Compliance Officer to ensure a complete and accurate understanding of the program.



Strategic Management concludes the Compliance Program Effectiveness Reviews with a Report of Findings and Recommendations to address each of the OIG's elements of an effective compliance program and to provide actionable recommendations for each area identified for improvement. Strategic Management collaborates with the Compliance Officer during review and will often present our findings and recommendations to the Board of Directors as part of their oversight responsibility for the compliance program.

Strategic Management Services empowers healthcare organizations to meet their regulatory compliance requirements by providing specialized products and services developed by proven industry experts. Founded in 1992 by the former Inspector General of the U.S. Department of Health & Human Services, Richard Kusserow, Strategic Management was the first healthcare consulting firm to focus on corporate compliance and ethics initiatives. Today we are the undisputed industry leader, having helped more than 3,000 healthcare organizations with highly-specialized, actionable regulatory compliance services.



Contact us today to learn more

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## Corporate Integrity Agreement Services

If your organization is in the process of negotiating, implementing, or managing a **Corporate Integrity Agreement (CIA)**, Strategic Management can provide you with expertise and actionable insights to help you meet CIA obligations.

Strategic Management has extensive experience with federal healthcare regulations and can help organizations across the healthcare industry meet important CIA deadlines and requirements. Strategic Management has a long-standing history of working with Compliance Officers, senior leadership, Boards of Directors, and the Office of Inspector General (OIG) to ensure compliance with stringent CIA requirements. Our experience enables us to provide **quality CIA services in an efficient and cost-effective manner.**



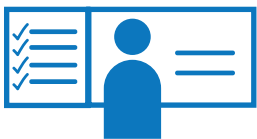
### Independent Review Organization (IRO) Services

Strategic Management provides IRO services to organizations under CIAs by conducting claims, arrangements, transaction, unallowable costs, marketing practice, and compliance reviews. Strategic Management also conducts “mock IRO reviews” to help prepare organizations in meeting their CIA obligations.



### Compliance Expert to the Board of Directors

Strategic Management serves as an independent compliance expert to Boards of Directors of healthcare organizations across the industry, assisting these Boards in their oversight responsibilities of compliance programs and in meeting CIA obligations. This includes conducting comprehensive compliance program evaluations and providing Boards of Directors, Compliance Officers, and the OIG with findings and recommendations for customized program improvements. Strategic Management also conducts Board of Directors-level compliance training on governance responsibilities, compliance, and regulatory requirements, as well as ongoing education on their responsibilities with the compliance program.



### CIA Implementation

Strategic Management assists Compliance Officers with implementation of CIA elements and obligations, and helps manage key deadlines for CIA-related actions. This includes drafting and executing compliance policies and procedures, executing required training plans and developing training material, establishing Disclosure Programs, and other required actions according to mandated timelines.

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**COMPLIANCE CONSULTING**

# HIPAA Privacy and Security Compliance Services

Strategic Management provides interim and designated privacy and security staffing, HIPAA advisory services, serves as Interim Privacy Officers, develops and conducts training and education, and conducts risk assessments and remediation to **help organizations easily and successfully maintain compliance**. Our highly knowledgeable and experienced healthcare compliance consultants help healthcare organizations better understand and manage their HIPAA responsibilities.



Strategic Management offers assessment services that evaluate your organization's compliance with the requirements of the HIPAA Privacy and Security Rules and your overall data security and privacy posture to identify gaps in your internal controls. Additionally, Strategic Management implements compliance tools, such as policies and procedures, technical and non-technical audits and risk assessments, and complaint tracking processes, to promote breach preparedness and facilitate HIPAA compliance efforts.



Strategic Management provides highly trained and experienced interim staff who are able to quickly assess and address your HIPAA needs, deficiencies, and gaps. These certified HIPAA experts possess in-depth knowledge of the HIPAA Privacy and Security Rules and regulations, as well as complaint management processes.



Strategic Management provides both virtual and in-person, instructor-led HIPAA training that includes programs ranging from training for front-line staff to more comprehensive programs for managers, directors, and decision makers.

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# Outsourced and Interim Compliance Support

Compliance departments are often faced with the challenge of addressing the operational needs of their compliance program with limited, or even inadequate, resources and staff. This makes it difficult to sufficiently address compliance risks and maintain effective program operations.

Strategic Management provides critical support to Compliance Officers by offering **compliance advisory services**, serving as an **outsourced Designated Compliance Officer** or **short-term Interim Compliance Officer**, and providing **compliance support services**.



## Compliance Advisory Services

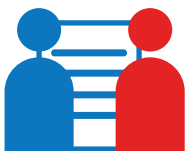
Strategic Management offers the services of our expert consultants to provide advice on your compliance program while you maintain internal control over the program. Strategic Management can also assess your program to establish appropriate staffing and structure and can assist in training and developing internal talent.



## Outsourcing and Interim Support

Strategic Management provides Compliance Officer services through one of two options:

- **Interim Compliance Officer:** temporarily staffing a highly-experienced compliance professional in a Compliance Officer role while the organization searches for a permanent candidate.
- **Designated Compliance Officer:** engaging a highly-experienced consultant to serve as an external, or designated, Compliance Officer with responsibility for conducting compliance program operations.



## Compliance Support Staff

Strategic Management partners with your Compliance Officer to achieve program objectives and efficiently and cost-effectively fill in the gaps of your internal compliance team. Our quality staff supports the overall objective of your program, including conducting investigations, performing compliance training, and developing policies and procedures.

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