

Sold! After Private-Equity Backed National Specialty Provider
Develops and Fully Integrates Compliance Program

1. Background – a 6-year-old private equity-backed multistate specialty provider, sold in a nearly billion dollar transaction, after growing five-fold in size during the four-year engagement, from 60 providers in 2 states at 30 locations, with 300 staff, to 280 providers at 155 locations in 11 states, with 13 ambulatory surgery centers and 2,700 total staff. In Year-2, the company had engaged True Compliance to help with the strategic buildout, implementation and full integration of its compliance program.
2. Project – the Consultant began the anticipated multi-phase engagement with a compliance program assessment, including interviews with executive leaders, physicians, and medical and administrative staff, as well as clinic and ASC visits, and review of various documents, in order to gain an understanding of the program’s status and culture. The assessment concluded with strategic recommendations to be carried out with the Consultant’s assistance in the subsequent ‘foundation building’ project phase. Then, phase three emphasized integration, and included the development and implementation of a clinical documentation and coding audit program. The engagement was completed in phase four, which focused on completing Compliance Program development, preparing for Compliance buyer due diligence, and recruiting and transitioning to a fulltime, dedicated Chief Compliance Officer.
3. Plan – the compliance program assessment focused on the U.S. Sentencing Guidelines “Seven Elements of an Effective Compliance Program,” along with published guidance from the U.S. Dept of Justice and Inspector General’s Office of the U.S. Dept of Health and Human Services. Several key areas were emphasized, specifically development and implementation of compliance policies and procedures, training and education programs, and an audit program. To optimize efficiency, facilitate accessibility and knowledge sharing, and to promote the visibility of compliance in the organization, the Consultant was formally designated as Company’s Fractional Compliance Officer, and regularly worked out of Company’s corporate offices.
4. Results – the engagement resulted in a number of valuable, tangible outcomes, including: 1) development of various live clinical documentation and coding educational presentations, which were recorded and later used for company-wide and new employee orientation training, 2) development and publication of a readily accessible, easily readable Documentation & Coding Manual, filled with real case examples, 3) development, implementation and administration of an objective, risk-weighted clinic site survey tool, along with related clinic and leadership reporting templates and dashboards, 4) development and implementation of a clinical documentation and coding audit program, to ensure adherence to industry best practices, 5) preparation and delivery of regular compliance reports to Company’s Board of Directors, Board Compliance Subcommittee and Compliance Committee and, finally, 6) mentoring and coaching Company’s Compliance Specialist.
5. Conclusion – this engagement spanned the full continuum of compliance program development, implementation, integration and, finally, handoff. Company’s program was initially nascent, with little structure and few policies. However, over time the program scaled in size and sophistication, reflecting Company’s growing needs and the evolving risk landscape. The engagement ultimately resulted in the successful recruitment and handoff to Company’s first fulltime, dedicated Chief Compliance Officer, along with the significant sale transaction, to a sophisticated buyer, who recognized upon deep due diligence inspection the Company’s responsive, well developed, fully integrated compliance program, which evidenced Company’s longtime commitment to ethics and integrity.