



# COMPLIAGENT

Solutions. Not Surprises.

**YOUR HEALTHCARE  
COMPLIANCE PARTNER**

# TABLE OF CONTENTS

- 3 ABOUT US
- 4 SERVICES
- 7 WHY OUTSOURCE
- 9 CLIENTS
- 11 CASE STUDY - Drug Diversion Guidance
- 12 CASE STUDY - HIPAA - Business Associate Risks
- 13 CASE STUDY - Triple Check Observations - Billing Audits
- 14 CASE STUDY - Minimum Data Set (MDS) Assessment & Training
- 15 CASE STUDY - Employee Training - Customer Service and Resident Dignity
- 16 CASE STUDY - M&A Due Diligence - Hospital Acquisition

## LINKS

[HEALTHCARE COMPLIANCE NEWS](#)

[ASK A COMPLIANCE QUESTION](#)

[COMPLIANCE SELF-ASSESSMENT](#)

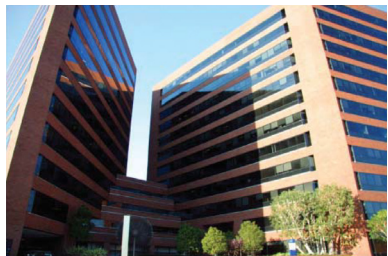
[CONTACT US](#)



**COMPLIAGENT**  
Solutions. Not Surprises.

11845 West Olympic Blvd. Suite 1250 Los Angeles, CA 90064  
p. 310.996.8950 | f. 310.996.8955 | [compliagent.com](http://compliagent.com)

# ABOUT US



Compliagent is a Los Angeles-based regulatory consulting firm serving healthcare providers nationally. Combining unparalleled compliance experience and comprehensive capabilities across a full range of provider types, Compliagent collaborates with clients to help them thrive in today's complex business and regulatory environment. Compliagent draws on decades of experience in healthcare regulatory compliance, which affords us deep understanding of healthcare administration, clinical operations, reimbursement, human resources, and finance.

## **Compliagent's model for achieving quality and efficiency includes:**

- Integration of regulatory compliance and business strategy, strategic planning, sound process, and technology.
- Hands-on collaborative relationships with clients to achieve strategic objectives.
- Genuine knowledge transfer, enabling our clients to achieve lasting improvement in operations and care delivery.
- Utilization of highly skilled and talented consultants with diverse areas of expertise and a passion for healthcare.

## **MEET OUR TEAM**



**COMPLIAGENT**  
Solutions. Not Surprises.

11845 West Olympic Blvd. Suite 1250 Los Angeles, CA 90064  
p. 310.996.8950 | f. 310.996.8955 | [compliagent.com](http://compliagent.com)

# SERVICES

Compliagent is your partner in designing and maintaining a healthy regulatory compliance infrastructure. Whether you are facing a compliance emergency or want to outsource all or portions of your compliance needs, we efficiently create and implement custom solutions.

*"Compliagent's team was easy to work with and went above and beyond our expectations improving compliance and identifying areas of opportunity."*



**COMPLIANCE PROGRAM  
INFRASTRUCTURE**



**EDUCATION**



**COMPLAINT RESOLUTION**



**EXCLUSION SCREENING**



**AUDITING**



**HIPAA**



**LICENSING**



**LITIGATION & ENFORCEMENT  
ACTIONS SUPPORT**



**DUE DILIGENCE**



**CRISIS MANAGEMENT**



**COMPLIAGENT**

Solutions. Not Surprises.

11845 West Olympic Blvd. Suite 1250 Los Angeles, CA 90064  
p. 310.996.8950 | f. 310.996.8955 | [compliagent.com](http://compliagent.com)



### COMPLIANCE PROGRAM INFRASTRUCTURE

- Custom Compliance Plan
- Policy and Procedure Development
- Compliance Survey
- Governance Structure and Support
- Compliance Program Effectiveness Review



### EDUCATION

- Monthly/Quarterly/Annual Regulatory and Industry Updates
- Live or Webinar-based Training:
  - Regulatory Requirements
  - Operational Processes
  - Patient Care



### COMPLAINT RESOLUTION

- Hotline Hosting
- Investigational Guidance and Support



### EXCLUSION SCREENING

- Background Checks
- Employment History Verification



### AUDITING

- Anti-Kickback Statute Liability
- Physician Contracting
- Management of Marketing Practices and Vendor Relationships
- Quality of Care and Documentation Standards
- Abuse and Neglect
- MDS Accuracy
- Hospital Re-Admissions
- Acuity-Based Staffing
- Billing and Coding
- Disaster Preparedness
- OSHPD



**COMPLIAGENT**

Solutions. Not Surprises.

11845 West Olympic Blvd. Suite 1250 Los Angeles, CA 90064  
p. 310.996.8950 | f. 310.996.8955 | [compliagent.com](http://compliagent.com)



## **HIPAA**

- Information Privacy and HIPAA Plan
- HIPAA Audit
- Security Rule Risk Analysis / Threat Assessment
- PHI Breach Response
- Enforcement Actions



## **LICENSING**

- Survey Preparation
- Accreditation
- Informal Dispute Resolution (IDR) Support



## **LITIGATION & ENFORCEMENT ACTIONS SUPPORT**

- Expert Witness Testimony
- Investigational Support
- Deposition Support
- Independent Review Organization (IRO) Services
- Corporate Integrity Agreement (CIA) Assistance



## **DUE DILIGENCE**

- Healthcare Mergers and Acquisitions
- Transactional Finance and Lending
- Regulatory Risk Analysis



## **CRISIS MANAGEMENT**

- Government Investigation
- Whistleblower



**COMPLIAGENT**

Solutions. Not Surprises.

11845 West Olympic Blvd. Suite 1250 Los Angeles, CA 90064  
p. 310.996.8950 | f. 310.996.8955 | [compliagent.com](http://compliagent.com)

# WHY OUTSOURCE

## Why Outsource Compliance Services?

The Affordable Care Act (ACA) and its associated regulations create costly compliance obligations for your business. By outsourcing all or parts of your compliance needs, your organization will benefit from:



### **COST-SAVINGS**

Decrease the need for costly in-house compliance staff and lower your risk of fines/damages.



### **TIME-SAVINGS**

Reduce the time management spends overseeing the compliance function and keeping up-to-date with changing regulatory requirements.



### **INCREASED OBJECTIVITY**

Gain a clear picture of risk areas and demonstrate your commitment to operate within compliance of the regulations.



### **REDUCED ENFORCEMENT RISK**

Benefit from expert advice from an experienced team of legal, clinical, and operational experts



**COMPLIAGENT**

Solutions. Not Surprises.

11845 West Olympic Blvd. Suite 1250 Los Angeles, CA 90064  
p. 310.996.8950 | f. 310.996.8955 | [compliagent.com](http://compliagent.com)

## 7-Elements of an Effective Compliance Program

Hundreds of healthcare providers and business associates entrust their compliance risk management to Compliagent. Our well-honed processes align with the core elements of compliance programs federally mandated:

1. Implementing written policies, procedures, and standards of conduct.
2. Designating a compliance officer and compliance committee.
3. Conducting effective training and education.
4. Developing open lines of communication.
5. Conducting internal monitoring and auditing.
6. Enforcing standards through well-publicized disciplinary guidelines.
7. Responding promptly to detected areas of concern and undertaking appropriate corrective actions.

Contact us to learn how we can help your organization meet these requirements.



**COMPLIAGENT**  
Solutions. Not Surprises.

11845 West Olympic Blvd. Suite 1250 Los Angeles, CA 90064  
p. 310.996.8950 | f. 310.996.8955 | [compliagent.com](http://compliagent.com)

# CLIENTS

Compliagent is the provider-of-choice to mitigate compliance risks for healthcare providers and business associates. Our proactive, cost-effective approach results in stronger organizations and improved long-term profitability.

## LONG-TERM CARE PROVIDERS

- Skilled Nursing / Post-Acute
- Assisted Living Facilities
- Home Health Agencies
- Hospices

## PHYSICIANS & CLINICAL PRACTICES

- Medical Groups
- Primary Care Providers / Sub-Specialists
- Aesthetic Medicine
- Pain Management
- Integrative Health Providers

## HEALTHCARE FACILITIES

- Hospitals
- Ambulatory Surgery Centers (ASC)
- Federal Qualified Health Centers / Health Clinics / Retail Clinics
- Mental Health Treatment Facilities



**COMPLIAGENT**

Solutions. Not Surprises.

11845 West Olympic Blvd. Suite 1250 Los Angeles, CA 90064  
p. 310.996.8950 | f. 310.996.8955 | [compliagent.com](http://compliagent.com)



### ANCILLARY PROVIDERS

- Rehabilitation
- Ambulance / Medical Transport
- Durable Medical Equipment (DME)
- Diagnostic Imaging / Testing
- Pharmacy / Medical Supply Vendors



### BEHAVIORAL CARE PROVIDERS

- Behavioral / Mental Care
- Addiction and Recovery
- Autism / Youth and Family Services
- Residential Facilities / Group Homes



### HEALTHCARE CONSULTANTS AND VENDORS

- Information Technology Services
- Law Firms
- Business Solutions Firms
- Medicare and Medi-Cal Consulting Firms

"Thank you so much for the professional and **superb quality** of work done by your team. I'm so happy I got to know Compliagent. Hopefully, this will be the beginning of a long-term relationship."



**COMPLIAGENT**  
Solutions. Not Surprises.

11845 West Olympic Blvd. Suite 1250 Los Angeles, CA 90064  
p. 310.996.8950 | f. 310.996.8955 | [compliagent.com](http://compliagent.com)

# CASE STUDY

## Drug Diversion Guidance

A skilled nursing facility was first made aware of the possible diversion when they were advised by their pharmacy that refills were being ordered too soon and too frequently. In order to ensure that the investigation and corrective actions were in compliance with all state and federal regulations, as well as best practices, our client then contacted us seeking guidance and instruction for the investigation of possible drug diversion.

**Compliagent's Actions:** Compliagent consultants held conference calls throughout the investigation to advise the client with regard to the proper procedure for the investigation, including: suspension of suspected staff; comprehensive audit of medication carts and overflow; nursing license validation and board evaluations; staff interview procedure; in-service recommendations; and all other resource guidance up to and including resolution.

**Outcomes:** While the investigation had initially returned little to no results, once Compliagent intervened and began guiding the investigation, the "pieces of the puzzle" started coming together. Compliagent's guidance allowed the client to understand the complete scope of the diversion, including the total number of medications diverted, the number of residents potentially affected, and the chain reaction of diversion within the entity. Compliagent works alongside our clients to sift through the details and determine the root of the problem, while keeping within regulations and best practices. As the investigation began to yield a final result, Compliagent advised the client of all required notifications and disclosures to ensure that they were in compliance with mandated reporting laws. Upon resolution of the investigation, Compliagent also educated the client on proper documentation techniques, recommended in-services, and necessary follow-up to safeguard against future potential diversion.

The reception received from all involved parties was outstanding. While Compliagent consultants may view the scope of work as just "part of the job," the client was both confident and relieved at the conclusion of the investigation. Employing best practices - such as due diligence, active support, and follow-through - provides peace of mind to all those involved and promotes success for the client. It's one thing to simply send a few emails advising a client, however by speaking with the client and walking them through every step of the way – that's what sets Compliagent apart. Our clients truly appreciate our hands-on approach. Diversion investigations are incredibly serious and stressful for any organization, but with the right compliance consultant and the right professional guidance, such risks can be easily mitigated, resolved, and prevented.



*"Compliagent's team was very impressive in their immediate response and continued involvement. Right from the start,*

*we felt confident in Compliagent's guidance*

*and looked forward to seeing the investigation through with their support. We could not have been more pleased with their service."*



**COMPLIAGENT**

Solutions. Not Surprises.

11845 West Olympic Blvd. Suite 1250 Los Angeles, CA 90064  
p. 310.996.8950 | f. 310.996.8955 | [compliagent.com](http://compliagent.com)

# CASE STUDY

## HIPAA – Business Associate Risks

A healthcare insurance brokerage firm knew it needed to comply with the Health Insurance Portability and Accountability Act (HIPAA) as a “business associate,” but did not know how to proceed, so it contacted Compliagent for guidance. Pursuant to HIPAA, “business associates” are entities that perform functions or activities that involve the use or disclosure Protected Healthcare Information (PHI).

**Compliagent's Actions:** To identify our client's risk areas and gaps, we analyzed their current practices, safeguards, and IT policies and procedures. We drafted and implemented HIPAA-specific policies and procedures to bring them into compliance. To ensure all personnel understood requirements under HIPAA, we provided individualized training with custom materials tailored for each job function. We appointed a HIPAA security officer at the firm so our client's compliance with HIPAA is maintained on a daily basis with the necessary level of scrutiny.

**Outcomes:** Our client's risk of a potentially costly HIPAA violation has been dramatically reduced. The team now has the knowledge and tools to operate within compliance of HIPAA on an on-going basis.

*“Compliagent took the burden of worry away by quickly implementing the tools we need to be HIPAA compliant. As we hire new employees, we make sure their on-boarding includes HIPAA training from Compliagent.”*



**COMPLIAGENT**  
Solutions. Not Surprises.

11845 West Olympic Blvd. Suite 1250 Los Angeles, CA 90064  
p. 310.996.8950 | f. 310.996.8955 | [compliagent.com](http://compliagent.com)

# CASE STUDY

## M&A Due Diligence - Hospital Acquisition

**Client:** Private Capital Firm

**Challenge:** Client acquiring a community hospital needed to determine post-acquisition regulatory risks and associated costs.

**Solutions:** Compliagent concluded the hospital was operating substantially in compliance. Our due diligence activities included:

- Examining fraud and abuse concerns; Medicare conditions of participation and licensing matters; Medi-Cal, HIPAA, and Office of Statewide Health Planning and Development compliance; and, medical staff governance.
- Identifying robust compliance infrastructure, deficient areas, and regulatory requirements.
- Recommending actions to mitigate future risk, such as creating policy and education/training committees, quarterly policy reviews, and reporting structures.

"Compliagent's  
*specialized  
guidance*

*regarding healthcare  
compliance helped us  
close the transaction."*



**COMPLIAGENT**

Solutions. Not Surprises.

11845 West Olympic Blvd. Suite 1250 Los Angeles, CA 90064  
p. 310.996.8950 | f. 310.996.8955 | [compliagent.com](http://compliagent.com)

# CASE STUDY

## Minimum Data Set (MDS) Assessment & Training

**Client:** Skilled Nursing Facility

**Challenge:** Client's new MDS Coordinator needed MDS 3.0 Resident Assessment Instrument training to excel.

**Solutions:** Our Certified Resident Assessment Coordinator provided extensive training encompassing:

- Hands-on sessions covering initial, quarterly, annual and change of condition assessments. Case studies and Q&A confirming the MDS Coordinator's comprehension of the processes.
- Telephonic consultations for a period of ninety days after the live training.
- Ninety days after completion of the live training, conducting a validation audit of the MDS Coordinator's performance which included interviewing two MDS nurses.

"I was very impressed  
with Compliagent's  
**MDS**  
trainer's  
expertise  
and teaching ability."



**COMPLIAGENT**  
Solutions. Not Surprises.

11845 West Olympic Blvd. Suite 1250 Los Angeles, CA 90064  
p. 310.996.8950 | f. 310.996.8955 | [compliagent.com](http://compliagent.com)

# CASE STUDY

## Triple Check Observations – Billing Audits

**Client:** Long Term Care Operator, 3 Facilities

**Challenge:** OIG found the facilities at fault for overutilization and overpayment of Medicare funds for rehabilitation therapy prescribed by a third-party, but billed by the facilities.

**Solutions:** Through billing audits, Triple Check observations and interviews, we discovered and resolved:

- Deficiencies inhibiting the facilities' ability to bill for services rendered.
- UB-04 claims generally missing critical ancillary services (e.g., wound care, pharmaceuticals, and medical equipment provided to residents, reducing revenues.)
- Vital procedures missing from operational processes, particularly a failure to consistently cross-validate various disciplines' documentation in the verification process.
- Deficient Triple Check processes for Medicare Parts A and B.

Validation audits  
conducted

**3-6 months**  
after our initial work  
demonstrated a  
successful turnaround.



**COMPLIAGENT**  
Solutions. Not Surprises.

11845 West Olympic Blvd. Suite 1250 Los Angeles, CA 90064  
p. 310.996.8950 | f. 310.996.8955 | [compliagent.com](http://compliagent.com)

# CASE STUDY

## Employee Training Customer Service and Resident Dignity

**Client:** Long Term Care Operator, Multiple Facilities

**Challenge:** Client concerned about caregivers' customer service and the risks of resident-rights deficiencies.

**Solutions:** On-site, interactive training sessions were provided:

- Framed the origins and importance of customer service and resident dignity.
- Participants shared their experiences, helping everyone to align the training that we provided with their responsibilities.
- Collaborative group exercises assessed participants' knowledge of actual resident dignity/customer service situations, and promoted teamwork through discussion of the caregivers' diverse points-of-view.

Caregivers gained a new appreciation for the importance of a  
*customer service-oriented culture.*



**COMPLIAGENT**  
Solutions. Not Surprises.

11845 West Olympic Blvd. Suite 1250 Los Angeles, CA 90064  
p. 310.996.8950 | f. 310.996.8955 | [compliagent.com](http://compliagent.com)



**COMPLIAGENT**  
Solutions. Not Surprises.

P. 310.996.8950 | F. 310.996.8955  
[www.compliagent.com](http://www.compliagent.com)  
11845 W. Olympic Blvd., Suite 1250  
Los Angeles, CA 90064