



Compliance TODAY

August 2017

A PUBLICATION OF THE HEALTH CARE COMPLIANCE ASSOCIATION

WWW.HCCA-INFO.ORG

Integrating experiential learning in compliance education

an interview with
Professor Paul Fiorelli

Director, Cintas Institute
for Business Ethics
Xavier University
Cincinnati, OH

See page 16



23

**Measuring compliance
program effectiveness:
The DOJ and OIG weigh in**

Gabriel Imperato,
Anne Novick Branan,
and Stephen H. Siegel

30

**The status on patient
status: Two-Midnight
Rule update**

Lauren S. Gennett and
Isabella E. Wood

38

**The Trump 2-for-1
Executive Order and its
impact on healthcare**

Steve Lokensgard,
Mike Adelberg,
and Frank Swain

44

**An enjoyable
risk assessment**

Cassandra A.
Andrews Jackson



FEATURES

- 16 **Meet Professor Paul Fiorelli**
an interview by Adam Turteltaub
- 23 **Measuring compliance program effectiveness: The DOJ and OIG weigh in**
by Gabriel Imperato, Anne Novick Branam, and Stephen H. Siegel
New guidance can help organizations determine whether they are doing enough to prevent, deter, and correct criminal behavior.
- 30 **The status on patient status: Two-Midnight Rule update**
by Lauren S. Gennett and Isabella E. Wood
Providers need to stay focused on length-of-stay billing problems, before they turn into RAC reviews, False Claims actions, whistleblower lawsuits, or corporate integrity agreements.
- 38 **The Trump 2-for-1 Executive Order and its impact on healthcare**
by Steve Lokensgard, Mike Adelberg, and Frank Swain
As a cost-saving measure, doing away with many of CMS's regulations is really nothing new and far more complicated than it may seem.
- 44 **An enjoyable risk assessment**
by Cassandra A. Andrews Jackson
If senior leaders are truly engaged in tone at the top, risk assessments do not have to be dry, boring, and tedious.



Compliance Today is printed with 100% soy-based, water-soluble inks on recycled paper, which includes 10% post-consumer waste. The remaining fiber comes from responsibly managed forests. The energy used to produce the paper is Green-e® certified renewable energy. Certifications for the paper include Forest Stewardship Council (FSC), Sustainable Forestry Initiative (SFI), and Programme for the Endorsement of Forest Certification (PEFC).

COLUMNS

- 3 **Letter from the CEO**
ROY SNELL
- 21 **Exhale**
CATHERINE BOERNER
- 28 **Managing Compliance**
LYNDA S. HILLIARD
- 36 **Connectivity**
NANCY J. BECKLEY
- 42 **The Compliance–Quality Connection**
DONNA ABBONDANDOLO
- 49 **Privacy Ponderings**
ERIKA M. RIETHMILLER
- 54 **Computer Tips**
FRANK RUELAS

DEPARTMENTS

- 6 **News**
- 12 **People on the Move**
- 78 **Newly Certified Designees**
- 80 **New Members**
- 82 **Blog Highlights**
- 83 **Takeaways**
- 84 **Upcoming Events**

by Nancy J. Beckley

Engaging on Twitter – It's all about style

Nancy J. Beckley (nancy@nancybeckley.com) is President of Nancy Beckley & Associates LLC, a rehab compliance consulting firm in Milwaukee, WI.

[in](#) /in/nancybeckley [tw](#) @nancybeckley [g+](#) +NancyBeckley

Among the HCCA's Compliance Institute attendees, Twitter has long been the social media of choice.

When Twitter was newer to the CI attendees, the HCCA routinely held "TweetUps" on



Beckley

the opening night to engage users' Twitter. Tweetups are now in our rearview mirror as more and more attendees and HCCA members take to Twitter to post updates, retweet important notices from CMS and the OIG, as well as to keep up with happenings including HIPAA and healthcare reform.

Twitter has enhanced the experience over the years. Whether you engage with Twitter directly via your Twitter page, or via a social media platform such as TweetDeck or HootSuite, you can't help but notice the engaging pictures, videos, and photos that are becoming routine with Tweets. In fact, you are more likely to engage with the Tweet by opening the link just because a picture enhanced your interest. Are you left wondering how you can add graphics and videos to your Tweets? Perhaps the best opportunity lies in the ease of use of Canva. Canva is a free graphic design tool website that has been around about five years. There are templates for all social media platforms (including Instagram, Facebook, Twitter). There is an easy drag-and-drop interface, thousands of fonts, designs, photos, and templates. To use Canva there is no need

for expensive and complicated graphics programs, no need for an artist's eye, and no need to purchase photographs unless you want to upgrade.

Back to Twitter, whether you routinely engage on Twitter, or hope to engage more, there are five tips straight from the Twitter Bird's beak for your consideration¹:

- **SHORT:** Keep it short. A concise Tweet makes an impact.
- **VISUALS:** Use visuals in your Tweets. Adding a bold image, video, or GIF to your Tweets adds a touch of personality, and leads to higher Tweet engagement rates.
- **HASHTAGS:** Incorporate relevant hashtags, a powerful tool, however best practices recommend using no more than two hashtags per Tweet.
- **QUESTIONS AND POLLS:** Ask questions and run polls. Asking questions is an effective way to interact. Use Twitter polls to survey on specific responses.
- **CURATE AND CONNECT:** Retweet relevant content and reply to remain a presence. Rule of thumb – your Retweets reflect back on your business and should align with your purpose and values.

Do you plan on enhancing your Twitter engagement? Take a look at Canva and be inspired. Connect with [@theHCCA](#) and me [@NancyBeckley](#).

1. <http://bit.ly/2sViYKz>