



UBO Compliance Program: Enterprise Compliance Plan & Internal Audit Checklist

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June 27, 2024

Agenda

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 - General Program Changes
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- Training
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 - Checklist (A to Z)
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 - Corrective Action Plans (CAPs)
- Key Supporting Documents (KSDs)
- Conclusion
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BLUF

What

DHA UBO has restructured and implemented changes to the UBO Compliance Program that includes a standardized plan and internal audit checklist.

Why

Plan and checklist templates were managed at the MTF-level and edited based on the facility's specific processes, policies and procedures.



How

The new program will assist with resolving and validating audit findings, as well as identify weaknesses, risks, and areas for improvement.

When

Implementation of the new Compliance Program has a projected go live of July 2024.



Introduction

- The DHA UBO Compliance Program aims to establish internal controls and procedures around standardized Enterprise processes to reduce operational errors and minimize potential audit findings in the future.
- The Program consists of two major components:
 - DHA UBO Compliance Plan
 - DHA UBO Compliance Audit Checklist



Key Positions & Roles

MTF Director

The MTF Director will appoint a disinterested reviewer and endorse the completed checklist.

Disinterested Reviewer

The disinterested reviewer will complete the checklist and submit the results to the UBO Manager for their preliminary review.

UBO Manager

The UBO Manager must review the completed checklist and provide recommended action, as appropriate.

Data Quality (DQ) Manager & Data Quality Assurance Team (DQAT)

UBO is required to attend the monthly meetings conducted by the DQ Manager and DQAT and communicate compliance-related issues, as necessary.



Current State Analysis

- Each MTF is currently responsible for maintaining their own Compliance Plan and Checklist based on their individual or prior Service processes, procedures, and policies.
- MTFs are presently storing quarterly checklist results locally.
- With the implementation of MHS GENESIS and MTF transfer under DHA authority, policies and procedures needed to be updated to promote consistency, standardization, and internal controls across the Enterprise.



Enterprise Compliance Program

- The newly established DHA UBO Compliance Program will be synchronized with Enterprise Audit Response and Remediation efforts to:
 - Resolve and validate audit findings from the three major auditing bodies: Department of Defense (DoD) Financial Audit, Government Accountability Office (GAO), DoD of Inspector General (DoDIG).
 - Identify UBO program weaknesses, risks, and areas for improvement.
 - Standardize applicable processes across all 129 MTFs.



Compliance Program Standardized Changes

- Removal of outdated, irrelevant questions.
- Removal of Claims Submission Worksheets.
- Restructure of Compliance Committee Charter requirement.
- Updated reporting and submission requirements.
- Development of a centralized webpage for compliance resources and checklist reporting via LaunchPad.
- Development of UBO Compliance Management mailbox to serve as the dedicated hotline for compliance-related inquiries.
- Compliance Management added to DHA UBO Program Office Open Forum Group.



Implementation Timeline

Phases (Fiscal Year, Quarter)	Checklist Contents	Implementation
Phase I (FY24, Q3)	MSA (Public & Federal)	Jul 2024
Phase II (FY24, Q4)	TPC (includes Phase I questions)	Oct 1, 2024
Phase III (FY25, Q1)	MAC (includes Phase I and Phase II questions)	Jan 2, 2025
Phase IV (FY25, Q2)	Comprehensive (All Phases)	Apr 1, 2025



DHA UBO Compliance Audit Checklist

- DHA UBO will be sending an e-mail to all MTF org boxes reminding them the quarter is about to start.
- The checklist will be obtained and submitted through the DHA UBO Intranet (LaunchPad) for Compliance Management.
- MTF UBOs will complete and submit the endorsed checklist, no later than the 15th day of the second month in any given quarter.

Quarter	Data Months	Start Date	Submission Date	CAP Completion NLT Date	Re-Inspection Findings Submission Date
Q1	OCT, NOV, DEC	JAN 1	FEB 15	JUN 30	AUG 15
Q2	JAN, FEB, MAR	APR 1	MAY 15	SEP 30	NOV 15
Q3	APR, MAY, JUN	JUL 1	AUG 15	DEC 31	FEB 15
Q4	JUL, AUG, SEP	OCT 1	NOV 15	MAR 31	MAY 15



Questions?



Checklist Overview



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Introduction



Checklist

- The DHA UBO Compliance Audit Checklist serves as an internal control review and a major cornerstone of the DHA UBO Compliance Program.



Documentation



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Version



Checklist Overview: 'Index' Tab



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Introduction



Checklist



Documentation



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- The **Index** tab offers an overview of each section and its respective requirements. The links direct the MTF staff to the section for their reference.

Index (Linked to Section)	
1	
2	Introduction
3	Section I: Completed By
4	Section II: Re-Inspection Findings
5	"Checklist" Tab Instructions
6	"Documentation" Tab Instructions
7	CAP Template
8	MTF Commander Endorsement Template
9	Checklist POC Information
10	Checklist
11	1. GENERAL COMPLIANCE
12	2. SEGREGATION OF DUTIES
13	3. SAFEGUARDS
14	4. WORK ITEM QUEUES AND ERRORS
15	5. MEDICAL SERVICES ACCOUNTS (MSA)
16	MSA PUBLIC

MSA PUBLIC

Index Introduction Checklist Documentation



Checklist Overview: 'Introduction' Tab



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Introduction



Checklist



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- The Introduction tab provides an overview of the reporting schedule, MTF POC info (to input), checklist instructions, and embedded templates.

The DHA UBO Compliance Audit Checklist serves as an internal control review and a major cornerstone of the DHA UBO Compliance Program. This checklist is not inclusive of all guidelines; however, it represents a minimum baseline of items to be assessed as well as highlighting specific areas discovered during financial audits of MTF.

SAVE DOCUMENT PRIOR TO ENTERING ANY INFORMATION TO AVOID "READ ONLY" ERRORS THAT MAY OCCUR.

Quarter	Data Months	Submission Date	CAP Completion NLT Date	Re-Inspection Findings Submission Date
Q1	OCT, NOV, DEC	FEB 15	JUN 30	AUG 15
Q2	JAN, FEB, MAR	MAY 15	SEP 30	NOV 15
Q3	APR, MAY, JUN	AUG 15	DEC 31	FEB 15
Q4	JUL, AUG, SEP	NOV 15	MAR 31	MAY 15

Section I: Completed By (REQUIRED PRIOR TO STARTING CHECKLIST)

*Date:	Enter the Date the checklist was started.
*Fiscal Year (FY):	Enter the Fiscal Year the checklist is for.
*Quarter:	Enter the Quarter the checklist is for.
*Network:	Click on the box for "Network" and select the applicable entry from the drop down list.
*Facility/MTF:	Click on the box for "Facility" and select the applicable entry from the drop down list.
*Disinterested Reviewer POC:	Enter the Disinterested Reviewer Point of Contact.
*Disinterested Reviewer Title:	Enter the Disinterested Reviewer Point of Contact Title.
*Disinterested Reviewer Phone:	Enter the Disinterested Reviewer Point of Contact Phone Number.
*Disinterested Reviewer E-mail:	Enter the Disinterested Reviewer Point of Contact Email Address.
*UBO POC:	Enter the UBO Manager Point of Contact.
*UBO Title:	Enter the UBO Manager Point of Contact Title.
*UBO Phone:	Enter the UBO Manager Point of Contact Phone Number.
*UBO E-mail:	Enter the UBO Manager Point of Contact Email Address.

Section II: Re-Inspection Findings

POC:	Enter the Re-Inspection Findings Point of Contact.
Title:	Enter the Re-Inspection Findings Point of Contact Title.
Phone:	Enter the Re-Inspection Findings Point of Contact Phone Number.
E-mail:	Enter the Re-Inspection Findings Point of Contact Email Address.

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Checklist Overview: 'Checklist' Tab



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Introduction



Checklist



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- The **Checklist** tab contains a list of UBO-specific questions categorized by their functional or technical area for review and response.

Improving Health and Building Readiness. Anytime, Anywhere

Item #	Question	Category	Key Supporting Documents	Rating	Root Cause	Findings
1.1	Does UBO attend the monthly meetings conducted by the Data Quality (DQ) Manager and the UQ Assurance team (UQA)?	Data Quality Assurance Team (UQA)	1. Chain a copy of the Attendance Roster from the UQ Manager	Not Answered	Not Answered	
1.2	Does your MTF have access to the FMS Revenue Cycle Performance Measures Dashboard/Revenue Cycle Billing Performance Dashboard data?	FMS Dashboards		Not Answered	Not Answered	
2. SEGREGATION OF DUTIES						
2.1	Are billing, coding, and collecting duties segregated except for instances where short staffing does not permit a segregation of duty?	Segregation of Duties General		Not Answered	Not Answered	
2.2	Are there any instances where UBO works patient administration, clinical and/or coding functions? If so, which functions and explain why.	Segregation of Duties General		Not Answered	Not Answered	
2.3	Are all accountable individuals/officials responsible for public funds appointed in writing using 750 Form 577? Individuals include, but are not limited to: the USA (Chief (MSAC), alternate MSAC, UBO Manager, Siler, Collector, and Poster.	Segregation of Duties 750 Form 577		Not Answered	Not Answered	
2.4	Does your MTF run the ABACUS Line of Business Billing Report with Subcategory AND CPA Federal Adjustment Analysis Report monthly by the 15th day of?	Segregation of Duties	1. DQ Form 577 2. ABACUS LOB Billing Report with Subcat 3. CPA Federal Adjustment Analysis Report	Not Answered	Not Answered	

Index Introduction **Checklist** Documentation Glossary Version (1.0)



Checklist Overview: 'Documentation' Tab



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Introduction



Checklist



Documentation



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- The **Documentation** tab allows the MTF to add relevant documents, proof of evidence, and any additional documentation to support the checklist.

Documentation <small>Embed Associated Documents and Evidence of Compliance</small>			
Item or Question #	Documentation Description	Person Providing Evidence	Embedded Document
i	CAP Template		
ii	MTF Commander Endorsement of UBO Compliance Checklist		
Additional Documentation			



Checklist Overview: 'Glossary' Tab



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Introduction



Checklist



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- The **Glossary** will enable MTFs to reference a comprehensive list of terms, acronyms, abbreviations, descriptions and definitions.

ABBREVIATIONS & ACRONYMS	
Notation	Description
A&D	Admission and Disposition
ABACUS	Armed Forces Billing and Collection Utilization Solution
APV	ambulatory procedure visit
ASA	adjusted standardized amount
BETG	Business Event Type Code
CAP	corrective action plan
CFR	Code of Federal Regulations
CMS	Centers for Medicare and Medicaid Services
CPA	Center Patient Accounting
CRS	Centralized Receivables Service
CSE	Cosmetic Surgery Estimator
DAMP	Debt Adjudication Management Program
DHA	Defense Health Agency
DFAS	Defense Finance and Accounting Service
DEERS	Defense Enrollment Eligibility Reporting System
DQ	Data Quality
DQAT	Data Quality Assurance Team
DoD	Department of Defense
EFT	Electronic Funds Transfer
EOB	Explanation of Benefits
FI	Fiscal Intermediary
FMR	Financial Management Regulation
FRR/FOR	Full reimbursement Rate/Full Outpatient Reimbursement Rate
FY	Fiscal Year
I&R	Invoice & Receipt
IAW	In Accordance With
ID	Identification
IMFT	international military education and training

'Checklist' Tab Elements

- The **Checklist** tab will include the questions along with dropdown choices and sections to enter additional information where required.

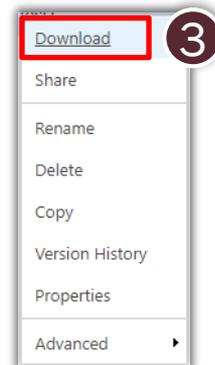
Headers	Expectation
Key Supporting Documents (KSDs)	<ul style="list-style-type: none"> Key supporting documents that are applicable to questions being asked. Documentation is not required during the submission of the checklist.
Rating	<ul style="list-style-type: none"> “Met”, “Partially Met”, “Not Met”, “N/A”
Root Cause	<ul style="list-style-type: none"> “N/A”, “Can’t Comply”, “Didn’t Know”, “Lack of Resources”, “Other”
Findings	<ul style="list-style-type: none"> Provide the findings of the Root Cause (if “Partially Met” or “Not Met”)
Corrective Actions & Estimated Time of Completion	<ul style="list-style-type: none"> Along with findings, provide a brief description of the Corrective Actions and use the CAP Template to provide the details including responsible part, what was the corrective action, where it took place, and how it was completed.
Re-Inspection Findings & Further Recommendations	<ul style="list-style-type: none"> Completed if a corrective action was needed in the prior reporting period. Identify any findings following Re-Inspection. This should also be annotated on the CAP template to close out the CAP. Provide any further recommendations as a result of the Re-Inspection.



Checklist Retrieval Instructions

- NOTE: Before you begin, ensure your SharePoint profile is current and reflects a health.mil e-mail address:
1. Navigate to the Compliance Management LaunchPad:
<https://info.health.mil/bus/brm/ubo/Pages/ComplianceManagement.aspx>
 2. Scroll down to 'UBO Compliance Management Resources' and select the Checklist button.
 3. Right click on the checklist file and select Download.
 4. Save the file with the following naming convention:

FYXX_QX_DHN_DMIS_MTF_Checklist_YYYYMMDD



Preparing the Checklist for the Audit

- Prior to starting the checklist these steps are required on the **Introduction** tab:

- Complete *Section I*
- Read the next sections, “*Checklist*” *Tab Instructions* and “*Documentation*” *Tab Instructions*
 - Download the *CAP Template*
 - Download the *MTF Director Endorsement of UBO Compliance*
- Review and update the UBO Roster with any changes prior to submitting the checklist, or as changes occur.

1

Section I: Completed By (REQUIRED PRIOR TO STARTING CHECKLIST)	
*Date	Enter the Date the checklist was started
*Fiscal Year (FY)	Enter the Fiscal Year the checklist is for
*Quarter	Enter the Quarter the checklist is for
*Network	Click on the box for "Network" and select the applicable entry from the drop down list
*Facility/MTF	Click on the box for "Facility" and select the applicable entry from the drop down list
*Disinterested Reviewer POC	Enter the Disinterested Reviewer Point of Contact
*Disinterested Reviewer Title	Enter the Disinterested Reviewer Point of Contact Title
*Disinterested Reviewer Phone	Enter the Disinterested Reviewer Point of Contact Phone Number
*Disinterested Reviewer E-mail	Enter the Disinterested Reviewer Point of Contact Email Address
*UBO POC	Enter the UBO Manager Point of Contact
*UBO Title	Enter the UBO Manager Point of Contact Title
*UBO Phone	Enter the UBO Manager Point of Contact Phone Number
*UBO E-mail	Enter the UBO Manager Point of Contact Email Address
Section II: Re-Inspection Findings	
POC:	Enter the Re-Inspection Findings Point of Contact
Title:	Enter the Re-Inspection Findings Point of Contact Title
Phone:	Enter the Re-Inspection Findings Point of Contact Phone Number
E-mail:	Enter the Re-Inspection Findings Point of Contact Email Address
Date:	Enter the Re-Inspection Findings Date
"Checklist" Tab Instructions	
Item # - Complete each item number in sequence.	
Key Supporting Documents - These are the key supporting documents that are applicable to the question being asked. Documentation is not required during the submission of the checklist. Separate communication will be sent to notify MTFs that were randomly chosen to provide this documentation.	
Rating - Select Met, Partially Met, Not Met, or N/A from the Dropdown Menu. Ratings of Partially Met or Not Met will trigger a Corrective Action and require a Hand Log to be	

2



Checklist Completion Instructions

- Once the checklist has been prepared:
 1. Go to the **Checklist** tab
 2. Complete each question in sequence (Column B)
 3. Complete dropdown selection:
 - a. ‘Rating’ (Column E): Met, Partially Met, Not Met, or N/A
 - b. ‘Root Cause’ (Column F): N/A, Can’t Comply, Didn’t Know, Lack Resources, or Other
 4. A comment (Column G) is required if the rating is ‘Not-’ or ‘Partially-Met’.
 5. A brief explanation of the Corrective Action Plan (CAP) and estimated completion date (Columns H and I).



Checklist Response Fields

- Required fields turn red based on the **Rating** chosen in Column E.



	E	F	G	H	I
	Rating	Root Cause	Findings <i>Explain answers in the space provided for each item. Must be completed if highlighted in <u>red</u>.</i>	Corrective Actions <i>Who, What, Where, How. Must be completed if highlighted in <u>red</u>.</i>	Estimated Completion <i>MM/DD/YYYY</i>
3	Partially Met	Not Answered			
8	Not Met	Not Answered			
9	Not Answered	Not Answered			
10					



Completing Corrective Action Plans (CAPs)

- Determination of corrective action measures will be assessed on a case-by-case basis as CAP Templates are completed.
- Each MTF will determine the corrective action needed.
- CAPs can be successfully closed out once the MTF is able to obtain a 'Met' rating on their next submission period.
 - DHA UBO's goal is to provide the education and training necessary to obtain a 'Met' rating on MTF's next submission period.
 - Additional assistance will be provided to MTFs that are unable to achieve this rating.



CAP Template Completion Instructions

- Add line items for any questions where the Rating was ‘Partially-’ or ‘Not Met’.
- 1. Open the *CAP Template*
- 2. Complete the **Submission Period Information**
 - ✓ Fiscal Year, Quarter, Network, Facility/ MTF
- 3. Enter the CAP Information:
 - ✓ Check list No., Rating, Root Cause, Findings, Corrective Action, Estimated Completion Date (ECD), Re-Inspection Findings, Re-Inspection Findings Date, and Further Recommendations
- 4. Save using the following naming convention:
 - ✓ FYXX_QX_DHN_DMIS_MTF_CAPs_YYYYMMDD



CAP Template

Corrective Action Plan (CAP) Template								
Instructions		Template is to be completed if "Partially Met" or "Not Met" rating is identified on the UBO Compliance Audit Checklist						
Submission Period Information								
Fiscal Year		Enter the Fiscal Year the checklist is for.						
Quarter		Enter the Quarter the checklist is for.						
Network		-Select- Click on the box for "Network" and select the applicable entry from the drop down list.						
Facility/MTF		Click on the box for "Facility" and select the applicable entry from the drop down list.						
CAP Information								
Check list No.	Rating	Root Cause	Findings	Corrective Action	ECD MMDD/YYYY	Re-Inspection Findings	Re-Inspection Findings Date MMDD/YYYY	Further Recommendations
Enter question number from checklist (column A)	Enter Rating provided on checklist (column E)	Root Cause from checklist (column F)	Findings provided on checklist for the Root Cause (column G)	List Corrective Actions including responsible part, what was the corrective action, where it took place, and how it will be completed. (column H)	Enter the estimated completion date for corrective actions from checklist (column I)	Identify any findings following Re-Inspection. (column J)	Enter the date of the Re-Inspection (column K)	Provide any further recommendations as a result of the Re-Inspection. (column L)



Finalizing Checklist for Submission

1. Checklist is not considered complete until the MTF Director, UBO Manager, and the Disinterested Reviewer have provided signatures of endorsement.
 - a. The UBO Manager and the Disinterested Reviewer are to provide a digital signature at the end of the checklist.
 - b. Use the *MTF Director Endorsement template* for the MTF Director signature. Add to MTF Letterhead and correct signature block for submission.
2. Once the checklist and endorsement statement are signed, save both using the following naming convention. MTF will embed these in the **Documentation** tab (steps in upcoming slide):
 - a. FYXX_QX_DHN_DMIS_MTF_Checklist_YYYYM MDD
 - b. FYXX_QX_DHN_DMIS_MTF_Endorsement_YYY YMMDD

The image shows two screenshots related to the digital signature process. The left screenshot, labeled '1', is a 'Sign' dialog box. It contains a warning message: 'Before signing this document, verify that the content you are signing is correct.' Below this, there is a field for the signature and a 'Select Image...' button. The 'Commitment Type' dropdown is set to 'None'. The 'Signing as' field is 'CONTRACTOR' and the 'Issued by' field is 'DOD ID CA-63'. The right screenshot, labeled 'b', is a 'MEMORANDUM FOR DHA UBO' form. It includes fields for 'FROM:' and 'SUBJECT: UBO Compliance Audit Checklist Endorsement'. The body of the memorandum contains three numbered points regarding the compliance plan implementation memo and the UBO Compliance Audit Checklist. At the bottom right, there is a signature block for the MTF Director.

1

2

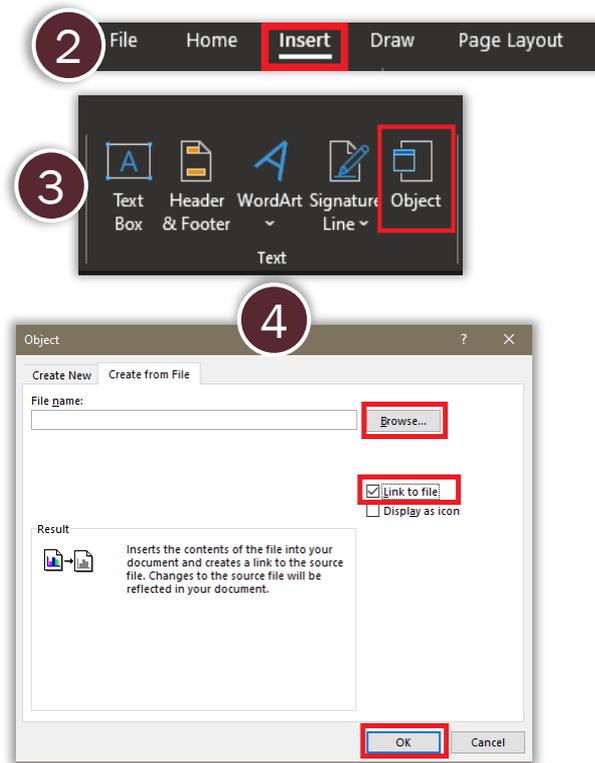
File name: **FY24_Q3_Atlantic_0104_NH Beaufort_Checklist_20240801**

Save as type: **Excel Workbook**



Embedding Documentation

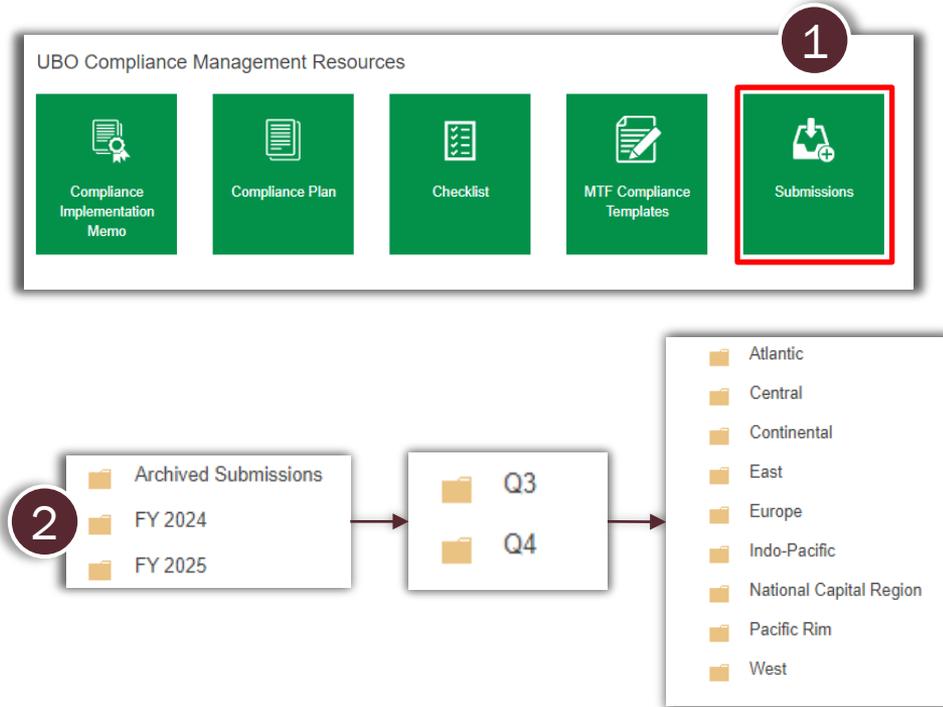
- MTFs will embed documents prior to submission.
 - a. MTF Director Endorsement
 - b. CAP Template
 - c. Attach any additional documentation associated with the Procedural Instruction
- 1. To insert a document, select the cell where the document will go.
- 2. At the top of the Excel spreadsheet. Click on **Insert** (3rd tab in ribbon header).
- 3. Then select **Object** .
- 4. Then select **Create from File**.
 - ✓ Ensure that **Display as Icon** is checked.
- 5. Then click on the **OK** button.



Checklist Submission Instructions

- The completed checklist (with embedded documentation) must be submitted by UBO Manager to Compliance Management LaunchPad Submissions folder:

1. Scroll down to 'UBO Compliance Management Resources' and select the **Submission** button.
2. Navigate through the folders to find your Network:
 - a. Fiscal Year → Quarter → Network → **Submission Folder**
 - b. Upload the checklist



Key Supporting Documents

- Each quarter a sample of four (4) to five (5) MTFs are to provide Key Supporting Documents (KSDs) with their quarterly submission.
- These are the primary documents relevant to the questions being addressed.
- Separate communication will be sent to notify MTFs that are randomly chosen to provide this documentation.



Additional Checklist Information



MTFs UBOs must maintain copies of the completed quarterly checklist for at least **six (6)** years.



All compliance program reporting and submission questions or issues can be submitted to the Compliance Management org box: dha.ncr.Financial-Ops-J-8.mbx.dha-ubo-compliance@health.mil.



Conclusion: Supporting the Mission

- In coordination with the DHA UBO Program Office's Education and Training initiatives, the Compliance Management team will facilitate compliance-specific education and training to be disseminated through the development and maintenance of the current UBO webinars and resources that standardize instruction and materials, job aids and templates pertaining to MTF UBO operations.



Resources: Training, Policy, and Communication

- More information regarding Enterprise DHA UBO Compliance Plan and Compliance Audit Checklist:

Guidance	Location
DHA UBO Webinars	Archived Webinars
General Policy Memos and Guidance Table	Policy and Guidance
Performance Measurements	KPIs, Metrics, and Collection Goals
Compliance Management LaunchPad	https://info.health.mil/bus/brm/ubo/Pages/ComplianceManagement.aspx

Organization	Contact Information
DHA NCR Financial Ops (J-8) Mailbox DHA UBO Compliance	dha.ncr.Financial-Ops-J-8.mbx-dha-ubo-compliance@health.mil
DHA UBO Helpdesk	UBO.Helpdesk@intellectsolutions.com



Questions?



Instructions for CEU Credit

This in-service webinar has been approved by the American Academy of Professional Coders (AAPC) for 1.0 Continuing Education Unit (CEU) credit for DoD personnel (.mil address required). Granting of this approval in no way constitutes endorsement by the AAPC of the program, content or the program sponsor. There is no charge for this credit.

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 - View the entire broadcast
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 - View the entire archived webinar (free and available on demand at <https://health.mil/Military-Health-Topics/Access-Cost-Quality-and-Safety/Uniform-Business-Office/UBO-Learning-Center/Archived-Webinars>)
 - Complete a post-test available with the archived webinar
 - E-mail answers to webmeeting@triafederal.com
 - If you receive a passing score of at least 70%, we will e-mail MHS personnel with a .mil email address a Certificate of Approval including an AAPC Index Number
- The original Certificate of Approval may not be altered except to add the participants name and webinar date or the date the archived Webinar was viewed. Certificates should be maintained on file for at least six months beyond your renewal date in the event you are selected for CEU verification by AAPC
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