



Tips from the Trenches

COMPLIANCE ADVICE FROM YOUR FELLOW HBMA MEMBERS

Annually reviewing and updating your compliance plan are necessary tasks to ensure your processes are effective and compliant with changing regulations, rules, and guidelines. We've asked some of our members to share their hard-won expertise in operational compliance and reveal what really works. Each contributor has addressed one example of a compliance undertaking, how it is done, and how it benefits them and their client.

Jackie Willett: Coding Audits

Our company performs coding for our clients, and therefore we invest in semi-annual external coding reviews. For this process, we:

- Research and interview several companies that offer coding audit services
- Verify the credentials of the company/auditor, check references, etc.
- Prepare, review, and sign an appropriate External Compliance Chart Audit Agreement
- Submit 25 charts per coder to the auditor for review of appropriateness of CPT and ICD-9 coding, with a patient-by-patient coding analysis that will compare the billing company's original coding with the auditor's coding. Variances are addressed and discussed in a narrative summary provided by the auditor. Each case also examines modifier usage and documentation deficiencies with

a spreadsheet of patient-by-patient results.

- Invest financially in this compliance process. The range for a competent auditor review is usually between \$18–\$25 per chart.

Coding is a high risk area for the billing industry and for any specialty. Our commitment to education and coder training is ongoing. The fact that we invest financially in external coding audits is something that is respected by our clients. It helps us achieve our goal of consistent monitoring to detect any potential errors, so that immediate corrective training can occur.

Joe McCloskey: Monitoring of Mailing Service

We do a monthly sampling of our contracted mailing service. For a number of our ambulance clients, we provide inserts (satisfaction surveys, client specific information, etc.). Within our normal mailings each month, we include sample mock statements for each client and we document the date sent to the mailing contractor. Monthly, upon receipt at our mailing address, we note for each sampling the date forwarded to the mailing service, date post marked, date received at our mailing address, and whether the proper insertion was completed. Any negative findings are reported to our contractor. We believe this process keeps their attention. Clients are also made aware of our routine QA of their mailings and it is included in marketing communications.

Dennis Mock: Verification

When working with your clients regarding compliance policies and procedures, don't forget that some tasks are shared with other companies or vendors, such as collection agencies. Incorporate these entities in your compliance processes so your work is not inadvertently undone. Don't rely on your clients to know all the issues or to address them. Examples that work well for me include: audit for valid BAA agreements, verify that OIG exclusion checks are done and documented at least annually, check for violations and complaints with the licensing agency for collection agencies, if applicable in your state. Is there a process to verify that the client and his or her subcontractors and vendors are aware of and comply with new laws, regulations, and policies? Develop a checklist that you can review with your clients at least annually. Make sure your contract addresses responsibility for critical tasks and responsibilities.

Cindy Pittmon: Security

We installed a magnetic door in our offices to prevent visitors from entering our secure work areas. This ensures that all visitors must be escorted in any areas that might contain HIPAA protected information.

We purchased rolling suitcases for all of our couriers to insure that nothing could be inadvertently lost during transportation. Each suitcase has a large red tag identifying the contents as belonging to our company with contact

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CONTEMPLATING COMPLIANCE

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information and the warning that the contents are confidential.

Lynne Kottman: Surveys

We have begun conducting a compliance survey in conjunction with our annual reviews and in addition to doing an exit interview that covers compliance issues. This survey includes questions that cover the following:

- Personal engagement in practices that deviate from the compliance plan
- Awareness of activity of other employees, clients, or contractors that deviate from the compliance plan
- Attendance at compliance training
- Unasked compliance related questions
- Criminal charges/convictions/exclu-

sions/settlements since hiring

- Conflict of interest issues, such as accepting gifts from clients or working for competitors.

The benefits to the company, in addition to potentially uncovering compliance-related problems, are that we can identify those employees who don't understand the elements of our compliance plan.

Shawn Keough-Hartz: Software-Vendor Monitoring

One aspect that we have found amazingly helpful is to ensure the compliance of our software support vendors. We retain copies of the files sent to our vendors. Should we identify a problem,

such as claims "missing" at an insurance company, we can verify that the claim was generated and sent. This has assisted us in issues such as timely filing. We have proof of the original claim generation and successful transmission. This process has been worth its weight in gold! We also keep the raw files our billing system generates for direct submission to payors. By retaining these files, we are able to identify all changes made by our software vendors. We recently experienced a claim rejection due to an incorrect NPI. We could prove it was a change made by the software vendor that resulted in reporting an incorrect provider number. We also use these same functions as part of our ongoing compliance auditing and monitoring. ▲



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