

AUDITING & COMPLIANCE TIP

Accessing Your Risk

This is a new year and with each new year we know that resolutions and new commitments to business practices tend to occur. At the turn of the year, many practices start to pull together their compliance plans and goals for the upcoming year. Before you head to that first 2015 compliance team meeting, be sure that you think about the cornerstones that should be addressed in an effective, annual compliance plan by considering the following:



1. **Are there already areas of compliance concern for 2015?** These would be the "known" factors in your office that should be addressed in order to maintain active compliance. Consider compliance factors such as, HIPAA; maybe you have addressed concerns regarding PHI, but the HIPAA rules are much more complex than only the management of PHI. If you are unsure, then this would be a great area to direct your focus for 2015.
2. **With every plan an audit is a primary function for billing and coding accuracy, but are there concerns about the current auditing policy in place?** When was the last time your policy was updated? Policies are meant to be living and breathing documents, meaning they are ever-evolving and changing. As coding/billing rules and guidance changes, refer to your auditing policy to ensure it is appropriate. For example, with the additional scrutinization of modifier usage, is your practice targeting documentation reviews for the "hot" modifiers in their internal auditing plan or are your planned reviews strictly E&M targeted based on random selection processes only? E&M are great services to review, and random selection is key in an audit, but an effective review should also include some targeted reviews as well.
3. **Assess who the members of your compliance team are and their effectiveness.** The size of your compliance team may not be as big of a deal as the diversity of the team. Be sure to include individuals who represent each aspect of the practice, such as a clinical team member (nursing staff and/or provider), administrative team member (supervisor and/or administrator), billing representative, coding representative, and if available, a compliance and auditing trained team member. Not all practices will have employees in each of these categories, but each should try to create some sort of diverse team.
4. **Incorporate tools to make 2015 a success!** Do not feel that you must reinvent the wheel every year for the sake of compliance. There are many templates available to help you build effective policies for your practice! Use these tools to assist you! Use risk analysis information such as productivity reports, trending analysis, and software programs such as CCRA to know where your compliance focus should be as well as who it should focus on.

In a more perfect world, a practice would have already constructed their path to compliance for 2015, but that does not mean it is too late for those who have not yet begun.