



NAMAS Weekly Auditing & Compliance Tips

September 9, 2016

Who Can It Be Knocking At Your Door? Are You Prepared?

The truth is you can never be fully prepared when a Special Investigative Unit (SIU) from Medicare or Medicaid shows up unannounced. With that said, you can use this tip to help understand what your obligations are and how to act to ensure it is as smooth a process as possible and does not lead to your being booted from participating with The Centers for Medicare and Medicaid Services (CMS). I have followed a very simple business philosophy throughout my 20+ years in this industry as outlined by Sir Henri Deterding: "There is a master key to success with which no man can fail. Its name is simplicity. Simplicity, I mean, in the sense of reducing to the simplest possible terms every problem that besets us. Whenever I have met a business proposition, which, after taking thought, I could not reduce to simplicity, I have left it alone."

Too often we work against ourselves, over thinking situations and running through all of the possible downsides that could present themselves rather than focusing on what it is that's in front of us and finding the best way to get from point A to point B. That is really what an audit and its findings are... how they got from A to B. Our

Become
a Member

As a NAMAS member, you'll receive access to monthly webinars for CEUs (including those hard to find CPMA CEUs!), a subscription to BC Advantage magazine, discounts on products and NAMAS training events, and much, much more!

We offer 4 membership levels- choose the one that best suits your needs!

Click Here to View NAMAS Membership Levels and Benefits

For added convenience, NAMAS accepts PayPal, PayPal Credit, quarterly and monthly payments of membership dues.

**TWO GREAT QUICKINARS
PRESENTED BY FRANK COHEN**



job is then to figure out if the audit findings met all of the steps between point A and point B.

Receiving a letter from a carrier, investigatory agency or private payer is stressful enough. But what happens when someone shows up at your door with a business card and a letter and wants everything right then and there? This is a situation that is becoming more familiar and one that if you are not willing to accept that this can and possibly will happen to your practice, then the outcome will have serious adverse effects.

During the last month, we at DoctorsManagement have had multiple practices reach out to us for support and guidance because they had someone show up from AdvanceMed (ZPIC) and/or the Special Investigative Unit (SIU-Medicaid) demanding access to medical records, provider schedules, sign-in sheets, and imaging studies. The organizations were varied in geographic location, size and specialty, so there is no real detectable pattern as of yet.

The following are things you can do to ensure you are feeling good about your outcome with one of these groups:

- **Understand Your Risks** This can be accomplished by using a program such as [Compliance Risk Analyzer](#) by the Frank Cohen Group. Programs like this use applied statistics and data-mining algorithms to rank your risk from 0-100 and then create a specific audit plan based on high and moderate risks. Using methods such as probe audits or auditing what everyone else is auditing may not give you an accurate picture of what your true risk(s) might actually be.
- **Perform Audits of Providers' Documentation on a Regular Basis Under Attorney Client Privilege** Focus on the medical necessity and the subjective portions of the encounter (i.e. HX and MDM), but do not ignore the exam. Audit focus should be on Dx

codes, modifier application, ancillary services, minor procedures, time as a controlling factor, etc. in addition to E&M services. The purpose of a



WHAT'S A QUICKINAR™?

[quick-in-r]
noun

1. like a webinar, only better.

Take a Data Adventure With Frank Cohen Tour the New National UCR Charge Database

In this 30 minute Quickinar, Frank Cohen will take you on a tour of the new national UCR charge database with special focus on how easy it is for you to use the data to create, adjust and maintain your own competitive fee schedule. Frank will also go over the statistics included in the data and how to use them to create additional metrics.

Thursday, September 15, 2016
1:00PM - 1:30PM EST

[Click Here to Register](#)

Frank Cohen's "Secret Formula" Calculating Work RVUs that Define FTE by Specialty

In this short Quickinar (30 minutes), Frank Cohen will introduce you to his secret formula for calculating the number of work RVUs that define 1 FTE by specialty. Attendees will receive a special Excel template that contains statistically significant ranges by specialty.

Thursday, September 15, 2016
2:00PM - 2:30pm EST

[Click Here to Register](#)

Become



addition to E&M services. The purpose of a provider's documentation is to "paint a clear picture for the auditor who will be reviewing the information at some point but more importantly to ensure that any provider assuming the care of the patient can do so in a safe and prudent manner." In addition, ensure that documentation exists and that is complete and legible, ensure that anyone making an entry into the record is logged for identification purposes, ensure all notes are signed, and validate supervision of NPPs and whether or not incident-to or split/shared guidelines are met.

- **If Issues Have Been Detected** that did not require you to make a refund, file a corrected claim or self-disclosure. Use the Corrective Action Plan (CAP) process to ensure compliance in the future.
- **Monitor and Update your OIG Compliance Plan** and policies at a minimum, annually. Some will need to be reviewed much more often

Even following the steps above does not ensure you will never be audited, but when it does happen at least you know where you stand. When an unannounced site review takes place, the following are steps you should take to make the process less arduous:

- Ask for their business card and a letter. It should be on official letterhead and addressed either from CMS, your carrier, or the private payer they are representing.
- If it is an official review, they will have a letter outlining the number of patients in their audit sample, the dates of service in question, and your rights under your participation agreement.
- Contact your legal counsel, consultant, or compliance representative immediately to inform them of what is happening and what guidance they can provide.
- Speak with the representative who is onsite,

ensuring them that your organization is happy to comply with any requests they have, however, request patience if they have a long list and require multiple dates to be copied



Our onsite or online training program will not only prepare you to sit for the medical auditing certification test, but will prepare you for a career as a medical auditor.

As a bootcamp attendee, you will receive the NAMAS Auditor's Resource & Prep Guide, 16 AAPC CEUs, AND a 1 year NAMAS membership!

Our **onsite** schedule is as follows:

September 15-16: Nashville, TN
October 6-7: Birmingham, AL
November 3-4: Charlotte, NC
December 5-6: Orlando, FL

Click Here to Learn More About The NAMAS Medical Auditing BootCamp



For those with a basic foundation of E&M auditing, or experienced E&M auditors just looking for a refresher, our 1-day E&M Auditing BootCamp is for you!

MDM? Medical Necessity? Guidelines? Audit Policies? We'll cover all of this AND more in this training program

- Never allow them access to your EMR without supervision. I have found many times these individuals try to look at how you document for other payers by going into various patient records. This is not only a breach of their participation agreement with your practice, but it is a violation of HIPAA.
- Do not refuse them access. This will result in them leaving and you will most likely receive a letter within 10-12 business days notifying you that you are no longer a participating provider or that they have suspended all payments to your organization until you comply with their request.
- Do not pick a fight with them, be rude/snide with remarks, or keep them waiting for an extended period of time. This only agitates the situation.
- Offer them some coffee or a beverage and direct them to a quiet space away from your patients. Nothing crushes patient confidence in a provider's practice like seeing officials from the insurance companies, or worse, the government lurking around.
- Get them what they ask for as quickly as possible to get them out of your office and minimize disruptions. Keep chatter to a minimum while they are there and if they ask to interview members of the practice, contact your legal counsel immediately as you do not want to incriminate yourself or disclose something that should not be disclosed.

"Everything should be made as simple as possible, but not simpler"- Albert Einstein

By now, you can see that I like to approach things simplistically. While an unannounced site visit can be a very nerve wracking experience, taking a simple approach and following the suggested steps above can make the experience less stressful and complicated for all involved. In addition, implementing proactive measures such as performing routine audits, and understanding your true risk can greatly reduce the level of stress and worry should an onsite visit to your practice occur.



This Week's Audit Tip Written By:
Sean M. Weiss, CMCQ, CPMA, CPC

Attend one of our upcoming **ONLINE** or **ONSITE** sessions:

1 day **online** session on October 24
 Or, attend one of our 1-day **onsite** sessions:

October 6, 2016: Covington, LA
 November 15, 2016: Columbus, OH

**Click Here to Learn More About The
 NAMAS E&M Auditing BootCamp**

Weekly Tip Sponsor

D O C T O R S[®]
M A N A G E M E N T
 Leave the business of medicine to us

NAMAS Calendar of Events



Click the image above to view our monthly calendar

Upcoming Webinars

NAMAS is proud to present the following webinars in September





Sean M. Weiss, CMCO, CIMA, CFC, CPC-P, CCP-P, ACS-EM
Sean M. Weiss is a Partner and Vice President of Compliance for DoctorsManagement, LLC, a full scale medical practice management, consulting and regulatory compliance firm.

We Want to See You In Orlando!



8TH ANNUAL
Auditing & Compliance
CONFERENCE 2016

You're Invited to Join us at the 8th Annual Auditing & Compliance Conference

Dates: Pre-Conference: Tuesday, December 6, 2016
Conference: Wednesday, December 7- Friday December 9, 2016

Venue: Loews Portofino Bay Hotel, Orlando, FL

This is the ONLY conference designed for medical auditors and compliance professionals!

Earn Up to 21.5 AAPC CEUs good toward Core A, CPMA, CPCO & CEMC certifications



Where better to be in December than in beautiful Orlando, Florida learning from the best in the business, networking with your peers, and **earning up to 21.5 AAPC CEUs?**

There's more good news! **NEW FOR 2016-** we've partnered with RACmonitor to provide a **FACILITY AUDITING track** during both pre-conference and conference!

Challenges with Electronic Communication

Speaker: Scott Kraft
September 13, 2016
2pm EST

Defending Yourself Against Commercial Insurer Recoupments

Speaker: Tom Force
September 20, 2016
2pm EST

E&M Encounter Review

Speaker: Pam Vanderbilt
September 27, 2016
2pm EST

NAMAS Members: Watch your Email for Registration Links

Non-Members: Email namas@namas.co to learn how to attend these webinars

Save on Medical Waste Disposal with PowerBuying



Medical waste disposal is something that every practice needs to remain safe & compliant. Many providers feel trapped by the high cost, long contracts, and monthly service fees and do not realize that there are other companies able to provide this vital service at a lower rate. The PowerBuying team is here to help you explore options that may help save you money.

To start saving, contact Craig King at

Attendees can select their pre-conference and conference sessions from any one of the following tracks: Physician-Based Auditing, E&M Auditing, Facility-Based Auditing, and Physician- Based Compliance!

Don't delay in registering- Lock in your conference rate with only a \$50 deposit!

[Click Here to View the Conference Agenda](#)

[Register Now](#)

NAMAS Conference Speaker Spotlight

Speaker Spotlight

Meet our speakers for the



Michelle West

CPC, CEMC, CPMA, CRC

Senior Compliance
Consultant
DoctorsManagement, LLC

Conference Sessions

Complimentary Tip of the Week

Our weekly auditing & compliance tip emails are available to anyone who could benefit from this information.

If you know someone who would like to receive these emails, invite them to sign.

Click the image above to be added to our email list!

Stay Infomed

Stay up to date with important news and announcements from NAMAS. Follow our social media pages to ensure you don't miss a beat!



Do You Have an Audit Tip Idea?

We want to hear from you! If you have a suggestion for a topic you'd like featured in our weekly auditing tip, let us know! Send us an email to namas@namas.co

Do You Want to Be Published?

If you have an auditing article you'd like to be featured in our weekly tip, send it to namas@namas.co for review. If we use your article, we'll send you a \$25 Visa Gift Card!

In This Issue

[Are You Prepared?](#)

[NAMAS 8th Annual Conference](#)

[Speaker Spotlight- Aimee Wilcox](#)

[NAMAS Auditing Services](#)

[Become a NAMAS Member](#)

[Frank Cohen Quickinars](#)

[Medical Auditing BootCamp](#)

[E&M Auditing BootCamp](#)

[Calendar of Events](#)

[Upcoming Webinars](#)

[Save Money With Powerbuying](#)

**NAMAS 8th Annual
Auditing & Compliance
Conference**

December 6-9, 2016
Orlando, FL
Loews Portofino Bay Hotel

View the full conference
agenda & register today
www.namasconference.com

- Auditing Critical Care Services
- Auditor vs. Auditor
- You Be the Judge

[Save Money With Powerbuying](#)
[Receive These Tips](#)
[Follow NAMAS](#)



8TH ANNUAL
Auditing & Compliance
CONFERENCE 2016

Too Many Audits Stacking Up?

Let our team help with the backlog & keep you current!

DoctorsManagement & NAMAS employ Senior Management Auditors with no less than 10 years of experience. Our team can perform your audits or offer hands-on assistance to your auditing team.

We can assist with:

- Valuation Audits
- Pre-Bill Audits
- Retrospective Audits
- Customized Training

To schedule your audit or training, contact NAMAS at 877-418-5564 or via email at namas@namas.co