



## Weekly Auditing and Compliance Tip

National Alliance of Medical Auditing Specialists | 877-418-5564 | [namas.co](http://namas.co) | [namas@namas.co](mailto:namas@namas.co)

March 17, 2017

### Getting Serious About Your Practice's Compliance

Click Here to Listen to This Week's Audit Tip



By now, hopefully most (if not all) practices know that the Office of Inspector General (OIG) has been stressing the importance of creating and abiding by a compliance plan for most of this decade. In its own words, the OIG believes

"that a healthcare provider can use internal controls to more efficiently monitor adherence to applicable statutes, regulations, and program requirements." The OIG has even been kind enough to provide the seven components upon which a physician practice can create a voluntary compliance program. [Click here to read this information.](#)

Perhaps your practice has been a bit slow to adhere to the OIG's guidance on implementing a voluntary compliance program. After all, it is "voluntary" so why spend the time, money, and resources on this area instead of an area that has better return on investment (ROI), such as patient care? The OIG states "a practice's focus on patient care can be enhanced by the adoption of a voluntary compliance program.". The example given is that an increase in accuracy in the



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!

providers' documentation may result from implementing a compliance plan and that, in turn, could actually assist in enhancing patient care.

Additionally, the OIG believes that a well-designed compliance program can:

1. Speed and optimize proper payment of claims
2. Minimize billing mistakes;
3. Reduce the chances that an audit will be conducted by HCFA or the OIG;
4. Avoid conflicts with the self-referral and anti-kickback statutes.

Voluntary compliance programs, assuming the plan is being followed, show that the practice is making good faith efforts to submit claims appropriately and taking steps toward preventing problems from occurring in the future. These programs also impose an ethical duty on employees to report conduct that may be fraudulent so that it can be addressed properly. Not having a compliance program, or not following one that has been created (which is almost worse than not having one) opens the practice up to having the government impose its own compliance plan, known as a Corporate Integrity Agreement (CIA) in the event fraudulent conduct is found.

The difference between a compliance program and a Corporate Integrity Agreement is striking. Whereas a compliance program is voluntary, a CIA is a government-imposed compliance program mandated as part of a civil settlement agreement related to a fraud and abuse investigation. Usually, a CIA is offered to a practice or provider instead of the provider being excluded from all federal healthcare programs. Under a CIA, a practice or provider is under government oversight and an outside expert is going to be involved in the practice's compliance activities. A CIA is designed to be intrusive and to make certain that the practice is in compliance.

In order to avoid the imposition of a CIA, practices need to seriously consider dedicating the time and resources to implementing their own voluntary compliance program. While there are many compliance program kits available, some of which are better than others, it is always best to craft a streamlined manual with customized policies that are followed by everyone in your organization. This will mean appointing or hiring a compliance director, scheduling training for all employees, and most importantly, being willing to *change* how you may be doing things currently. In some cases, depending on

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.



Our **Medical Auditing Bootcamp** will train you to become a medical auditor. Learn the principles of auditing, compliance regulations, and how to perform the daily duties of an auditor.

Our 2-day Medical Auditing Bootcamps are scheduled as follows:

March 23 & 24: Louisville, KY  
April 26 & 27: Savannah, GA  
June 21 & 22: Houston, TX  
July 10 & 11: Jacksonville, FL  
August 17 & 18: Asheville, NC

**And more! Click here for more information**



Our **2-Day E&M Auditing Bootcamp** is an accelerated auditing training specific to E&M auditing. Learn about audit policies, get clarity

the size of your practice or the complexities involved, it may be necessary to bring in outside help to conduct a gap-analysis, set up your compliance plan, train the staff, and perform other necessary functions.

Once your compliance plan is in place, it needs to be monitored and assessed regularly to ensure its effectiveness. The Compliance Officer must assist the Board or Owners of the practice in the oversight responsibilities and provide periodic updates. Employees must be proactive in reporting possible erroneous or fraudulent conduct and the appropriate steps must be taken to act on those tips. Having an effective compliance program is an active, ongoing process; the plan itself cannot be a static document and an organization can never say it has finished complying. At the end of the day, compliance is everyone's responsibility. It's time to get serious about your practice's compliance and take steps to be proactive, not reactive.

#### This Week's Tip Written by:

Jesse D. Overbay, JD  
Jesse serves as a Senior Management Consultant and Associate General Council for DoctorsManagement, LLC



### Sample what a NAMAS membership can offer you with our FREE 1-month LITE trial membership

Register for our 1-month free trial LITE membership and experience a sample of what a NAMAS membership has to offer - NO Credit Card Information Needed!

During your trial, you'll receive access to weekly webinars for a chance to earn CEUs, weekly auditing and compliance tips, and even a sample of BCAdvantage magazine!

on documentation guidelines, medical decision making, medical necessity and more. Plus, during this training program you will have the opportunity **earn our NEW CREDENTIAL - Certified Evaluation and Management Auditor (CEMA)!**

Our 2-Day E&M BootCamps are scheduled as follows:

March 28 & 29: Miami, FL  
April 5 & 6: Lexington, KY  
April 11 & 12: Chicago, IL  
April 20 & 21: Atlanta, GA  
May 5 & 6: Las Vegas, NV  
And more!

[Click Here to Learn More & View Our E&M Auditing BootCamp schedule](#)



### Upcoming Webinar Sessions

NAMAS is proud to offer the following webinars in March

#### Mitigating Risk for Your Organization

Speaker: Frank Cohen  
March 21, 2017  
2pm EST

This webinar is FREE for NAMAS Platinum and Gold members, and Silver and Basic members who have selected our compliance webinar series.

This webinar is available for purchase for \$49.99

[Click here to purchase](#)

#### Hands On: Auditing IntraOffice Orthopaedic Services

Speaker, Pam Vanderbilt, CPC, CPC-I, CPMA  
March 28, 2017  
2pm EST

This webinar is FREE for NAMAS Platinum members. This webinar is also available for purchase for \$49.99

[Click here to purchase](#)

### NAMAS Calendar of Events

Click the image above to get your 1-month free trial membership today!



## We're Happy to Announce our 9th Annual Auditing & Compliance Venue

Our 9th Annual Auditing & Compliance Conference will be held this December at the **Loews Sapphire Falls Resort at Universal Orlando**

Conference Agenda Coming Soon!

Take advantage of early bird pricing, available **ONLY through March 31, 2017!**

### NAMAS Member Pricing

Conference Only: \$995  
Pre-Conference & Conference: \$1195

### Non-Member Pricing

Conference Only: \$1095  
Pre-Conference & Conference: \$1395

Secure your spot at this year's conference and lock in your early bird registration rate with just a \$50 deposit using the link below!



Click the image above to view our monthly calendar

## Weekly Tip Sponsor

**D O C T O R S**<sup>®</sup>  
**M A N A G E M E N T**

Leave the business of medicine to us

DoctorsManagement, LLC is a full service physician consulting firm in business since 1956.

Click the image above to learn more about DoctorsManagement



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 Up to Date With NAMAS News & Announcements

Follow us on social media and always be in the know!



