Could It Happen to You?
Lessons from Today’s Headline Cases

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Discussion Points

• Today’s sensational headlines, what are the themes?
  • Issues from recent settlements
  • Ideas to leverage scarce compliance resources

• Best practices
  • Practical suggestions for messaging, visibility and influence
  • Minimizing response time, mitigating risk
Where to Start? Recent Themes in the News

What is your level of exposure?

- New/Established patient visits E/M codes
  - University of California San Francisco Health (dba UCSF Medical Center)
  - Boston Medical Center
  - UMass Memorial Medical Center
  - Carilion Medical Center

- Ambulance Services
  - Freedom Ambulance
  - North East Mobile Health Services/Maine Medical Center

- Upcoding BLS to ALS
  - Arkansas Excellent Transport
  - American Paramedical Services
  - Central Health
  - Eascare
  - Lifeguard Ambulance Service
Where to Start? Recent Themes in the News

What is your level of exposure?

• Physician supervision requirements
  • ‘Incident To’ OIG project
    • Female Pelvic Medicine Institute and Nathan Guerette
    • Labib Riachi/Susan Toy
    • Joseph A. Raia
  • Unlicensed, excluded, unqualified and unsupervised
    • Scripps Health
    • Complementary Support Services
    • Orthopaedic and Neuro Imaging
    • Southwest Trinity Management, LLC

Where to Start? Recent Themes in the News

What is your level of exposure?

• Medically necessary
  • Action Medical Equipment/Kaja Medical Equipment and Supply
  • 21st Century Oncology
  • Life Care Centers of America
  • CVC Heart Center
  • Northwell Health, Inc.
• Services not provided
  • Home Family Care
• Physician financial arrangements
  • Lexington Medical Center
  • Mercy Hospital Springfield/Mercy Clinic Springfield Communities
Where to Start? Recent Themes in the News

What is your level of exposure?

• Kickbacks, other improper payments
  • Processing and handling fees
    • Health Diagnostics Laboratory/Singulex
  • Provider payments, benefits and investment opportunities
    • Forest Park Medical Center
    • Pine Creek Medical Center
    • Respironics, DME
    • Galena Biopharma
    • Millennium test cups CMPL case project
    • UPMC/Medicor Assoc.
    • CHRISTUS self-disclosure
• Patient payments, inducements
  • Tobii Dynavox
  • DaVita

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Best practices
Practical tips for implementation: Understanding and influence

• Where is compliance?
  • At the table from innovation and due diligence onward
  • An essential part of the team, understanding priorities and strategy

• Emphasize relationships...
  • In calm waters, before a storm
  • Cast a broad net, from front line to c-suite
  • Collaboration and cooperation

• Educate, educate, educate!
  • Be in the “know”
  • What’s the value?

Best practices
Practical tips for implementation: Understanding and influence

• Create champions
  • What are our values? Strategy?
  • Compliance’s role in identifying and mitigating risk, revenue retention

• Communication and visibility

• A good reputation is worth protecting
  • Monitor national, regional headlines
  • Educate, homegrown examples
  • Perception is everything
Best practices
Practical tips for implementation: Minimizing response time, mitigating risk

• **Invest the time in preparation**
  • Role definition, responsibilities
  • Who is on the team?
  • Establish expectations, a pragmatic approach to problem solving
  • Privilege and work product protection

• Intent matters!

• **Compliance belongs to everyone**
  • Share goals and empower others
  • Accountability and monitoring resides with operations
  • Do you say yes to everything?

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Best practices
Practical tips for implementation: Minimizing response time, mitigating risk

• **Circle back**
  • What happens after the corrective action?

• Be deliberate in your planning, methodologies, communications
  • Annual work plans
  • Investigation work plans

• **Review and monitoring**
  • Leveraging operational resources
  • Focus areas maximize limited compliance resources

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