

Enforcement and Discipline

Compliance directors should also formulate clear policies that outline specific consequences for employees who fail to meet or adhere to defined standards or procedures.

Disciplinary programs should be progressive in nature and be linked to appropriate remedies, ranging from additional training and education to transfer, suspension and termination.

For example, if the baseline audit reveals that a specific provider is making significant and/or repetitive documentation errors, then that provider should be informed of the problem and his or her performance should be included as part of a follow-up audit. If necessary, re-training should be provided. If the problem persists, additional training should be mandated, along with a requirement that the provider reimburse the group for the cost of audits and in-service. A letter of reprimand may also be appropriate. Continued difficulties could result in suspension or termination.

Mitigation and Prevention

The success of any compliance program ultimately depends on the extent to which the organization is committed to actively identifying and resolving regulatory problems. One way to build this commitment is to create channels of communication that allow employees, business partners and others to easily convey regulatory concerns to the appropriate individual or department without fear of penalty or retaliation. Anonymous hotlines are useful tools in this regard.

Organizations that take complaints seriously, thoroughly investigate questionable actions and promptly act to mitigate violations once they are identified will create a culture of heightened compliance awareness throughout the organization.

An Ounce of Prevention

In today's healthcare environment, regulatory mistakes can enormously damage an organization's finances and reputation. It is therefore critical that physicians establish, execute and sustain compliance programs that effectively address high-risk regulatory areas. These programs will mitigate compliance risk and also help build good will with regulators. In addition, they can help streamline revenue cycle operations and improve cash flow. ■

This article is the first in a series of three articles by Bredemeyer on compliance and physician practices.

About the author:

Bess Ann Bredemeyer, BSN, RN, CHC, CPC joined McKesson in 2005 and is Director of Compliance Services, responsible for consulting services related to physician coding and compliance practices. She has more than 22 years of healthcare experience and was previously the Compliance and Privacy Officer for a large academic health science center. Bredemeyer has also worked with healthcare defense attorneys and physician state licensing boards providing coding, compliance, billing and privacy consulting services. She has guest lectured at physician forums and residency programs, and she has taught graduate classes including health law and physician practice management. Bredemeyer received her Bachelor of Science degree in nursing and chemistry from Texas Christian University in Fort Worth, Texas. She is a certified professional coder (CPC) and member of the American Academy of Professional Coders (AAPC) where she has held several senior positions including local chapter president. She is an active member of the Health Care Compliance Association and is certified in healthcare compliance (CHC).



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Table of Contents Mckesson Physician Documentation Training Manual

1. Understanding the eBook Mckesson Physician Documentation Training Manual
 - The Rise of Digital Reading Mckesson Physician Documentation Training Manual
 - Advantages of eBooks Over Traditional Books
2. Identifying Mckesson Physician Documentation Training Manual
 - Exploring Different Genres
 - Considering Fiction vs. Non-Fiction
 - Determining Your Reading Goals
3. Choosing the Right eBook Platform
 - Popular eBook Platforms
 - Features to Look for in an Mckesson Physician Documentation Training Manual
 - User-Friendly Interface
4. Exploring eBook Recommendations from Mckesson Physician Documentation Training Manual
 - Personalized Recommendations
 - Mckesson Physician Documentation Training Manual User Reviews and Ratings
 - Mckesson Physician Documentation Training Manual and Bestseller Lists

5. Accessing Mckesson Physician Documentation Training Manual Free and Paid eBooks
 - Mckesson Physician Documentation Training Manual Public Domain eBooks
 - Mckesson Physician Documentation Training Manual eBook Subscription Services
 - Mckesson Physician Documentation Training Manual Budget-Friendly Options
6. Navigating Mckesson Physician Documentation Training Manual eBook Formats
 - ePub, PDF, MOBI, and More
 - Mckesson Physician Documentation Training Manual Compatibility with Devices
 - Mckesson Physician Documentation Training Manual Enhanced eBook Features
7. Enhancing Your Reading Experience
 - Adjustable Fonts and Text Sizes of Mckesson Physician Documentation Training Manual
 - Highlighting and Note-Taking Mckesson Physician Documentation Training Manual
 - Interactive Elements Mckesson Physician Documentation Training Manual
8. Staying Engaged with Mckesson Physician Documentation Training Manual
 - Joining Online Reading Communities
 - Participating in Virtual Book Clubs
 - Following Authors and Publishers Mckesson Physician Documentation Training Manual
9. Balancing eBooks and Physical Books Mckesson Physician Documentation Training Manual
 - Benefits of a Digital Library
 - Creating a Diverse Reading Collection Mckesson Physician Documentation Training Manual
10. Overcoming Reading Challenges
 - Dealing with Digital Eye Strain
 - Minimizing Distractions
 - Managing Screen Time
11. Cultivating a Reading Routine Mckesson Physician Documentation Training Manual
 - Setting Reading Goals Mckesson Physician Documentation Training Manual
 - Carving Out Dedicated Reading Time
12. Sourcing Reliable Information of Mckesson Physician Documentation Training Manual
 - Fact-Checking eBook Content of Mckesson Physician Documentation Training Manual
 - Distinguishing Credible Sources
13. Promoting Lifelong Learning

- Utilizing eBooks for Skill Development
- Exploring Educational eBooks

14. Embracing eBook Trends

- Integration of Multimedia Elements
- Interactive and Gamified eBooks

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