

Environment and Disciplinary

Compliance directors should also communicate other 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 remediation, ranging from additional training and education to transfers, 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 this or their 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 provided, along with a requirement that the provider reimburse the group for the cost of audits and re-training. 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 mitigating 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 compliance seriously, thoroughly investigate questionable actions and promptly act to mitigate violations create an environment that creates a culture of thoughtful compliance awareness throughout the organization.

An Chamber of Protection

In today's healthcare environment, regulatory investigations can severely damage an organization's financials and reputation. It is therefore critical that physicians establish, execute and maintain 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 Brendemeyer on compliance and physician practice.

About the author:

Reba Ann Brendemeyer, RNC, RN, FCHC, 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 23 years of healthcare experience and was previously the Compliance and Practice Officer for a large academic health science center. Brendemeyer has also worked with healthcare defense attorneys and physician coding consulting boards providing coding, compliance, billing and privacy consulting services. She has guest lectured on physician bonus and remediation programs, and has taught graduate classes including Health Law and physician practice management. Brendemeyer 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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