

## Elements of an Effective Compliance Program

Does the idea of creating an effective compliance program seem overwhelming? Is it already too late to plan for a **January 2013** kickoff? What must be included and what is optional?

The **Office of Inspector General (OIG)** of the U. S. Department of Health and Human Services has developed guidance documents for each of the major categories of healthcare entities such as hospitals, physician practices, home health agencies, skilled nursing facilities, durable medical equipment, prosthetics and orthotics suppliers, and third-party billing organizations. Each guidance contains the seven components of effective compliance programs, with slight variations in language appropriate to each type of organization. The components for individual and small group physician practices, for example, include the following;

- Performance of internal monitoring and auditing

- Implementation of compliance and practice standards
- Designation of a compliance officer or contact
- Training and education
- Response to offenses and corrective action
- Open lines of communication
- Enforcement of disciplinary standards

The guidance document for physician practices emphasizes that the components included in a compliance program and the scope of each component should reflect the particular nature of a practice and the available resources. This flexibility is in recognition of the voluntary status of compliance programs at the present time.

It can be difficult to determine exactly where to begin once a decision has been made to establish an effective compliance pro-

gram. In fact, the components to be included may not initially be obvious. It is sometimes beneficial to select one component for attention, and as progress takes place, the approach to implementation of other components becomes clearer. Another option is to craft a statement of intent outlining objectives and tentative timetables. There is no right or wrong first step. Choose an action, document it, and keep on going.



The **OIG, the Centers for Medicare and Medicaid Services**, and local **Medicare** carriers all offer educational materials in a variety of media on an ongoing basis. The **OIG** offers a series of short videos regarding a variety of compliance-related topics. These can be found on their website:

<https://oig.hhs.gov/compliance>

## Billing Tip of the Month

The importance of verifying patient eligibility **before** the patient's scheduled appointment is a key factor in keeping your **patient A/R** current. Coverage related denials are costly to your practice, and in today's economy, close to **30%** of a medical practice's total revenue comes from the patient. Knowing what a patient's current benefit status is, including

any deductibles and copays, will arm you with the necessary information you need to address financial responsibility with them. **CRT Medical Systems** has partnered with **Exchange EDI**, a company offering benefits verification technology to assist physicians with a solution to this issue. Contact **John O'Green** at CRT for more information. (248) 679-1606

*Happy Holidays*

**Holiday Support Hours**

**CRT offices will be  
CLOSED on:**

**Monday, Dec. 24th  
Tuesday, Dec. 25th  
Tuesday, Jan. 1st**