

CORPORATE COMPLIANCE MATTERS

By: MICHAEL A. SMITH, CCO, CCE, EVERCARE BI-MONTHLY NEWSLETTER, April 10, 2019, VOL. 4, #18

SUCCESS THROUGH COMPLIANCE | HOTLINE: 844/371/4700

Q & A's:

1] Why are email attacks happening? These attempts try to fool workers to unknowingly surrender their credentials or financial information. Healthcare workers are especially vulnerable to email-based attacks due to the high volume of PHI being accessed and due to frequent communication with Members, Patients, Clients and other providers.

2] If someone asks you a question about the health status of a Member, Patient or Client, what should you do? You tell them you cannot discuss any private information.

3] Can you share your computer password with new staff? Not allowed.

TODAY'S TOP ACRONYMS

1. CA: Corrective Action
2. CIN: Client Identification Number
3. FI: Fiscal Intermediary
4. LUPA: Low Utilization Payment Adjustment
5. MCO: Managed Care Organization
6. PDGM: Patient-Driven Groupings Model
7. ROC: Resumption of Care

HEALTHCARE COMPLIANCE PROGRAMS ARE UNDERGOING a fundamental shift toward being risk-based rather than process oriented based on NYS OMIG eight [8] elements. Risk is seen a critical part of our Compliance Plan. Risks are issues of concern, no matter the department, brought to our attention by our Compliance Committee by outside persons or any employee. To address any risk issue, it is important to be able to: 1] identify the risk, 2] assess the likelihood of risk, 3] the impact to our organization, members, patients or clients, 4] the significance of the risk occurring and 5] the controls in place to lessen such risk. Risks affect us all in areas of claims, billing, medical necessity, quality care, complaints, protected health information, fraud, waste or abuse. Contact your supervisor or Compliance office and report any situation!

WHAT IS THE DIFFERENCE BETWEEN A PERSONAL CARE AIDE [PCA] AND HOME HEALTH AIDE [HHA]? The primary difference is the level of training. Although both involve personal care, our MLTCP use PCAs for tasks such as bathing and basic errands. Our CHHA uses HHAs for more complex needs; handle simple dressing changes and take basic vital signs.

EVERCARE CHOICE, our Managed Long Term Care Plan [MLTCP], complies with the NYS DOH June 21, 2017 directive that restricts marketing. The directive restricts us to only participate in health fairs and health education functions. Our MLTCP cannot sponsor plan specific events. Our MLTCP cannot reach out to prospective members or advertise the MLTCP on the radio or television. The prohibition does not include the Certified Home Health Agency or our Social Adult Day Program. That said, the CHAA and the SDC cannot have an event and include marketing to prospective MLTCP enrollees. For instance, our upcoming event on World Elder Abuse Awareness Day on June 14, Dutchess Community College, is a CHHA event. We are certain the upcoming event will be a success in getting out the message about Elder Abuse and hope that you all attend. [contributed by Dana Pavelock]

EVERCARE'S CERTIFIED HOME HEALTH AGENCY [CHHA] ACHIEVED THE COMMUNITY HEALTH ACCREDITATION PARTNER [CHAP] AWARD deeming it to meet Medicare Conditions of Participation. It is also certified as a Medicare provider and providing the highest standards of quality in delivering community-based care.

QUESTION: What kind of individual protected health information is protected by the HIPAA Privacy Rule? Is it written, electronic, or spoken? If your answer is for all three, you are correct.

"Science brings society to the next level; Ethics keeps us there" Dr. Hal Simeroth