

# CORPORATE COMPLIANCE MATTERS

By: MICHAEL A. SMITH, CCO, CCE, EVERCARE BI-MONTHLY NEWSLETTER, December 3, 2019, VOL. 5, #21

CONNECT WITH COMPLIANCE

HOTLINE: 844/371/4700

## Q & A's:

1] Q. When should you report your suspicions of fraud, waste or abuse to your Supervisor or Compliance office? A. Immediately B. The next time you see your Supervisor or Compliance Officer C. When you have time D. At end of the work day. Answer: A

2] Q: Do I have to follow the 'minimum necessary rule?' Yes you do. We all do. This rule limits the use and disclosure to the amount of PHI which is necessary to perform job functions.

**THE HOLIDAYS:** At this time of year, questions arise in regard to gifting. Part of providing Members, Patients and Clients with exceptional services involves making sure we do things in an ethical manner. This includes making sure we follow laws and regulations. To help do this we have a Code of Ethics that tells us we are not allowed to receive gifts from any Member, Patient or Client. No one should ever feel that they have to give our staff gifts [such as money, meals, gift cards, personally bought gifts] to get good care. We understand many are grateful for your hard work and services provided but instead of giving a gift, we ask that you request a note of thanks sent to our office or complete the "Share Your Experience" form.

**PROTECTING INFORMATION FROM IDENTITY THIEVES** Many of you continue to ask about phishing, cyberattacks and protecting your information. Cyberattacks, identity thieves are completely relentless in obtaining protected health information and **this comes at a high cost!** During this holiday season, cybercrime increases by nearly three times. Keep your work information by not carelessly opening any attachments or click hyperlinks with emails. **Phishing emails will pretend to come from a reliable source such as a brand name [Chase, Apple, Netflix] or someone you know. If you click on the email address of the sender you will often see that it is NOT from that brand/person.** Remember, ransomware, viruses or even password theft can be just one click away. **Always protect your passwords and do not share or provide it to anyone.** Lastly, cyber criminals rely on creating a sense of urgency, threats and unrealistic offers to trick anyone into providing the information. Be sure to **IMMEDIATELY** alert either your Supervisor, Compliance or the RSM Helpdesk. This is vital. Please know that our organization is in process of identifying a firm to conduct cyber security and penetration testing. More information will be forthcoming.

**A FEW TIPS:** Do not leave documents on any of our three [3] printers; avoid leaving any documents in plain view and cover documents when leaving your office for the day; shred unneeded documents immediately; re-read emails before sending; always check the "to" addresses in email; re-check and review your work for accuracy; be sure your notes are accurate, complete and contemporaneous and written as close to the time service or call was made.

## A COMPLIANCE POEM:

"When you're dealing with physicians, Don't base compensation on admissions. Services must be identified and real, or the weight of the government you may feel. Make sure your arrangements are commercially reasonable. Pay fair market value, which is always feasible. For referrals do not pay, or you may find yourself locked away, paying a hefty penalty or getting accused of committing a felony. Make sure that everyone knows the rules, so train and train, and give folks the tools. Help them embrace self-reliance and achieve success in compliance." *Lynn Barrett, Wright Way Health Professional, at Health Ethics Trust Best Practices Forum*

## TODAY'S TOP ACRONYMS

1. **ADL:** Activities of Daily Living
2. **CM:** Care Manager
3. **DME:** Durable Medical Equipment
4. **FI:** Fiscal Intermediary
5. **LUPA:** Low Utilization Payment Adjustment
6. **MCO:** Managed Care Organization
7. **MR:** Medical Review
8. **OASIS:** Outcome and Assessment Information Set
9. **PAC:** Professional Advisory Committee
10. **PDGM:** Patient Drive Grouping Models
11. **POS:** Point of Service
12. **VBP:** Value Based Payment