

Optometry Coding & Billing Alert

Focus on OIG Directives for Crystal-Clear Compliance

Small practices need compliance plans as much as the big ones do

Every optometry practice needs a compliance plan to help prevent liability for fraudulent billing, so there's no time to lose if your office operates without one.

"A lot of practices still don't have a compliance plan," says **Catherine Brink, CMM, CPC**, president of HealthCare Resource Management Inc. in Spring Lake, N.J. Large practices often realize the need for compliance guidance sooner than small practices. "But don't think that just because you're a small practice you don't need a compliance plan," Brink warns. Any practice without a compliance plan is at risk for noncompliant billing and faces the same liability if a carrier or the HHS Office of Inspector General (OIG) finds evidence of faulty billing.

Start With the OIG's 7 Components

The OIG outlines every necessary component of your compliance plan - and offers special guidance for small private practices (you can access this information online at www.oig.hhs.gov/fraud/complianceguidance.html).

According to the OIG, every compliance plan should incorporate and build on seven basic directives:

1. Conduct internal monitoring and auditing
2. Implement compliance and practice standards
3. Designate a compliance officer or contact
4. Conduct appropriate training and education
5. Respond appropriately to detected offenses and develop corrective action
6. Develop open lines of communication
7. Enforce disciplinary standards through well-publicized guidelines.

If you're feeling ambitious, you may want to try authoring your compliance plan's first draft using these components as the document's skeleton - and then fill in the customized details for your practice. But experts caution that you shouldn't go it alone from start to finish. Consider these compliance guidance options:

Work with an attorney: Enlist the help of your practice's attorney at some point during the compliance- plan drafting process according to how much you want to spend and how much help you think you need, Brink says. Getting a legal expert's input and final approval will ensure you haven't overlooked any important elements - and will bolster your plan's legitimacy.

Hire a consultant: You can hire a healthcare management consulting firm specializing in compliance plans to write your entire compliance plan or to offer legal advice. The more specialized your practice is and the more ancillary services you offer, the more help you're likely to need to make sure your compliance plan covers all your liability areas, says **Curtis J. Udell, CPAR, CPC, CMPA**, senior adviser with Health Care Advisors Inc. in Annandale, Va.

Even though the cost may be a deterrent, hiring a consultant to handle your compliance plan can save you valuable time. "I just wouldn't have had the time to do it myself," says **Mona Lisa LaBonte**, co-owner of Medical Billing of New England in Palmer, Mass. LaBonte hired a specialist to devise a customized plan for her billing company and feels the time savings and professional finished product made the investment very worthwhile.

Contact your specialty society: If your practice belongs to a healthcare specialty society, this may be an excellent resource to tap into, Udell says. Societies may have customized templates and other data useful for creating a specialty-specific compliance plan, he adds.

Resources available to American Optometric Association members include a practice resource center, a Quality and Assessment and Improvement manual, Medicare information, and a collection of HIPAA compliance resources. Members can log in at www.aoa.org.

CMS also offers several online resources, says **Anne Williams**, insurance and billing specialist at Chesterfield Optometric Center, a three-optometrist practice in Chesterfield, Va. Visit www.cms.hhs.gov/providers/pair/.