

## Part B Insider (Multispecialty) Coding Alert

### DOCUMENTATION: Know How To Cope With Altered Documentation

#### 6 tips guide your actions when someone makes unauthorized revisions

There's no need to panic if you suspect that someone in your practice - either a doctor or other staff person - has altered documentation incorrectly.

Attorneys offer the following six suggestions to deal with this situation:

- 1. Call an attorney.** The country is full of False Claims Act attorneys who will be happy to help you with this problem, says **Stephen Meagher**, a San Francisco attorney and former federal prosecutor.
- 2. Self-disclose as quickly as possible.** The **HHS Office of Inspector General** and Medicare carriers all have fraud hotlines, notes Meagher. You'll quickly discover who in your office is eager to deal with the problem and who wants to sweep it under the rug, he adds.
- 3. Figure out who might have altered the records.** The people who have had access to the records in question are usually apparent. "Most of the time, in our experience, it's not that difficult to figure out who was ... involved in altering records," says Meagher. "The line of custody or possession is fairly evident."
- 4. Be prepared to leave the practice if need be.** If you suspect a physician or administrator is systematically altering records to raise billing amounts, you should walk away as quickly as possible, says attorney **Joan Roediger** with **Obermayer Maxwell & Hippel** in Philadelphia.
- 5. Consider payment.** You should determine whether the documentation changes affected the claim's payment amount. "If you had an alteration and the purpose of the alteration was to correct mistaken info, that certainly wouldn't be problematic and wouldn't trigger any disclosure duty," says attorney **Robert Salcido** with **Akin Gump Strauss Hauer & Feld** in Washington. But if the change to the records raised the reimbursement level, you've got a problem.
- 6. Watch your stamp closely.** If you're a physician and you change practices, take your signature stamp with you when you leave. That way, your old practice can't keep submitting claims or records with your signature on them when you're gone, Roediger notes.