

Part B Insider (Multispecialty) Coding Alert

Follow This Compliance Director's Advice

As you use Dr. Taitsman's advice to create a compliance plan, keep the following quick tips in mind that can help you stay on the straight and narrow. This advice was offered by **Jacqueline Bloink**, CPC, a consultant with Coding Continuum, Inc. and compliance director for a provider group in Arizona, during CMS's webinar, "Affordable Care Act Provider Compliance Programs: Getting Started:"

- 1. Follow the OIG's Guide for Physician Groups.** This resource, available <https://oig.hhs.gov/authorities/docs/physician.pdf>, is free and can help you craft your compliance plan within the government's guidelines.
- 2. Access Fact Sheets.** The government's Health Care Fraud Prevention and Enforcement Team, also known as HEAT, offers free fact sheets, webinars and other reference materials that can guide you, as can the webinars within the CMS library, Bloink says.
- 3. Keep It Simple.** Remember that the entire staff will be reviewing the compliance plan, so making it too filled with legal-ese is going to throw off almost everyone but the compliance officer. Instead, make the plan easy to read and concise to entice more participation. It should be tailored to your practice and unique to your specialty and size. "Don't let the compliance plan be only window dressing for the organization," Bloink said. "Fancy does not impress anyone if the plan sits on a shelf or in a computer file."
- 4. Set an Annual Review Date.** On that date every year, you can tweak the plan to remove features that weren't relevant to your practice, change elements to make the plan more specific to your activities, and determine whether you need to solidify further training in any areas.
- 5. Engage the Physicians.** Offer a CME dinner or other event that the practitioners are likely to attend and where they'll feel safe asking questions about compliance. Your compliance officer should also engage practitioners informally throughout the year to make that connection and see if they have any general compliance questions.
- 6. Make the Compliance Plan a Positive Topic.** Don't treat the compliance plan like a scary endeavor, or people will shy away from addressing it. Instead, include it as another positive feature of your practice so people are eager to discuss it.
- 7. Ensure the Compliance Plan is Real.** If you don't intend to follow the compliance plan, then it's worthless, Bloink says. Make sure it's realistic and accessible, and that staff members always have access to the compliance officer for questions and suggestions.
- 8. Keep it Friendly and Fair.** Compliance professionals "need to stand up to some very strong personalities and organizations," Bloink says. "So you have to have guts, but you need to play fair."