

## Eli's Hospice Insider

### Reimbursement: Protect Against Audits With These 5 Steps

#### Prioritize your corporate compliance plan.

Don't get complacent just because Recovery Audit Contractors haven't named hospice-specific topics yet. RACs are likely to focus on hospice claims soon, and a host of other government contractors are breathing down your neck too.

Take these steps to protect against RAC and other auditors' review, suggests clinical consultant **Pam Warmack** with **Clinic Connections** in Ruston, La.:

1. Watch and learn. "I love the saying, 'A smart man learns from his mistakes, but a wise man learns from the mistakes of others,'" Warmack tells **Eli**. "Every provider out there should be listening closely to discover what care is being denied and to what degree."

For example: Look at CMS's top medical review issues (see story, p. 36) for hot spot ideas. Dementia as the primary diagnosis and stays exceeding 180 days are just a few.

2. Make necessary changes. Look at the risk areas highlighted by other auditors' denials, then work to limit your exposure in those areas. "Every provider should be preparing a quality program designed to minimize their risk if faced with review," Warmack advises.

3. Cover your compliance bases. "Every provider should be developing a formal corporate compliance program," Warmack urges. The **HHS Office of Inspector General** provides hospice-specific compliance guidance at [www.oig.hhs.gov/fraud/complianceguidance.asp](http://www.oig.hhs.gov/fraud/complianceguidance.asp).

4. Educate staff. You can't expect your staff to comply with rules and agency policies and procedures if they don't know about or understand them. "Staff education is more important than ever," Warmack stresses.

5. Hold staff accountable. Just going over the rules and requirements with your staff isn't enough. You need to give them a reason to go by those rules.

"Holding clinicians accountable for admitting only eligible patients ... and documenting care at a level that ensures reimbursement is absolutely essential," Warmack emphasizes.