

Pain Management Coding Alert

Reader questions: Stay Compliant By Checking OIG's Mid-Year Update

Question: A fellow practice manager recently told me that the Office of Inspector General (OIG) released a mid-year update to its annual work plan. Is this accurate, and are there any changes to the original 2015 OIG Work Plan that I need to know about?

Florida Subscriber

Answer: Your colleague is correct. The U.S. Department of Health and Human Services (HHS) recently released its 2015 Work Plan Mid-Year Update for fiscal year (FY) 2015. The plan sums up reviews and activities, new and ongoing, that OIG will pursue with respect to HHS programs.

Whenever the OIG updates anything that might affect medical practice management, you should at least be aware of the update. Some of the updates might affect your practice in some way, but others may not.

Rundown: This edition of the Work Plan, effective as of May 2015, describes OIG audits, evaluations, and certain legal and investigative initiatives that are ongoing. "In response to adjustments made to our Work Plan, this mid-year update removes items that have been completed, postponed, or canceled and includes new items that have been started since October 2014," according to the OIG.

There are two areas of the work plan update that might concern your practice if you belong to an accountable care organization (ACO) that uses electronic health records (EHR), or your practice is an inpatient rehabilitation facility (IRF).

"We will review the extent that providers participating in ACOs in the Medicare Shared Savings Program use electronic health records (EHRs) to exchange health information to achieve their care coordination goals," according to the OIG report.

The OIG will also evaluate these providers' use of EHR to "identify best practices and possible challenges in their progression toward interoperability (the extent that information systems can exchange data and have the ability to interpret those shared data)."

If you work in an inpatient rehabilitation facility, OIG will also be minding your payment system requirements in the second half of the year. "We will review compliance with various aspects of the IRF PPS [prospective payment service], including the documentation required in support of the claims paid by Medicare," according to the OIG. "We will determine whether IRF claims were paid in accordance with Federal laws and regulations."

Best bet: Check out the mid-year update at <http://oig.hhs.gov/reports-and-publications/archives/workplan/2015/WP-Update-2015.pdf>.