

Compliance Program Overview



Do you even know
if your practice is
at risk?

Benefit from our team's extensive experience and the compliance process that we have mastered.



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www.procodecs.com

ProCode Compliance Solutions offers a complete suite of compliance services for all provider types. We know this process can be time consuming, frustrating, and resource intensive. Our team has a proven track record for getting the job done right the first time and is committed to excellent customer service.



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COMPLIANCE PROGRAM INTRODUCTION

What is a compliance program?

A Compliance Program is the PROCESS each Practice implements to achieve its stated goals for revenue integrity. The program should encompass all areas of regulation applicable to your Practice. Because each Practice is unique, each Compliance Program should be developed to reflect the scope of services provided and the specific risks those services entail.

The Compliance Program guidance that has been issued by the Office of Inspector General (OIG) and Office of Medicaid Inspector General (OMIG) follows the Federal Sentencing Guidelines. The seven components required as a condition of participation are a basis or roadmap for each Practice's individual compliance plan to follow.

It is important to note that a Compliance Program is the blueprint for compliant behavior and the "culture" within and throughout the entire Practice. The only thing worse than not having a Compliance Program is to have a Compliance Program that is left on a shelf and not implemented.

What a Compliance Program Is NOT

It is important to understand what a compliance program is NOT. It is not just a book or set of documents collecting dust on a shelf. It is not a list or folder containing audit results. It is not an exercise to placate a government agency. And it is NOT a mandate for providers to change the way they organize medicine.

Why Does a Healthcare Practice Need a Compliance Program?

Compliance plans have been in the forefront of healthcare news publications for some time. A proactive approach to compliance will help the Practice uncover inefficiencies, and possibly items or procedures that could be considered fraud and abuse by the government. It is a good business policy that indicates good faith effort to comply with all applicable laws and regulations.

Having a program is a condition of enrollment with Medicare. NYS OMIG requires providers who meet specific standards to implement and certify annually that they have a program.

Certification

Some providers of Medicaid care, services, or supplies may be required to complete one or both of the following certifications:

- NYS Mandatory Provider Compliance Program (SSL) Certification New York State Social Services Law Section 363-d and 18 NYCRR Part 521 Certification
- Federal Deficit Reduction Act of 2005 (DRA) Certification

If your office currently meets one of these requirements either directly or indirectly, you are required to implement and certify that you have an effective compliance program.



DEVELOPING A COMPLIANCE PROGRAM

There are 7 basic elements to the Compliance Program:

- Written Standards of Conduct which includes policies of non- intimidation and non- retaliation
- Designation of a Compliance Committee and/or Compliance Officer
- Training and Education
- Effective Lines of Communication
- Disciplinary Procedures
- Auditing and Monitoring
- Investigations and Corrective Actions

Each healthcare Practice is unique, so each Compliance Program must also be unique. All Compliance Programs should be built upon the foundation of the seven basic components as listed in the Federal Sentencing Guidelines. However, the size and nature of the Practice will determine what and how each issue is to be addressed.

Because of the changing nature of healthcare regulation, the Compliance Program will be a “work in progress”. The program should be monitored and updated at least annually, and more frequently if necessary to provide for an up-to-date compliance program.





PROCEDURE COMPLIANCE SOLUTIONS CAN HELP YOUR PRACTICE:

- Create your policies & procedures program.
- Audit & monitor your compliance program.
- Monitor your risk assessment and take proactive measure to keep you compliant.

Call us for an initial benchmark compliance program assessment. We will provide a report and gap analysis for your review and discussion. Our assessment process is a collaborative effort and includes findings, recommendations, and the best practices to assist you with your “risk assessment” and developing your annual audit work plan.

Let us handle compliance so you can focus on the needs of your patients.



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With decades of clinical and administrative healthcare expertise, Alicia specializes in professional revenue cycle, payment integrity, compliance, and more. She offers advisory services to attorneys, healthcare administrators, and organizations, working on fraud intervention and assessments for both plaintiff and defense teams. Alicia excels in routine and complex documentation and coding reviews, providing in-depth claims data analysis, education, and risk mitigation strategies. Having served as the Director of Compliance for the American Academy of Professional Coders, she brings extensive experience in compliance program development. Alicia, a frequent national presenter on compliance, documentation, and coding, combines her rich background to assist clients in optimizing revenue and ensuring compliance.

Learn More About Us



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