

HCCA



HEALTH CARE
COMPLIANCE
ASSOCIATION

COMPLIANCE TODAY

Volume Seven
Number Two
February 2005
Published Monthly

Meet Keith Halleland

REGISTER TODAY!

HCCA'S 2005 COMPLIANCE INSTITUTE
APRIL 17 - 20, 2005, NEW ORLEANS

For more information see page 31 of this issue.

INSIDE

- 2 Leadership letter
- 3 News Flash
- 3 On the calendar
- 4 Sentencing guideline amendments
- 7 OIG's FY05 Work Plan
- 10 Pharmacy charge description master
- 12 Home Care CFG
- 13 Weblinks
- 14 Meet Keith Halleland
- 18 CEO's Letter
- 20 OIG Work Plan physician focus
- 24 HCCA/AHIA CFG

Letter from the CEO

Roy Snell

"Now I have seen everything."

A woman from Twinsburg, Ohio, recently admitted to impersonating a Department of Health and Human Services (DHHS) employee. Given the way defense attorneys and the general public treat DHHS you've got to wonder what she was thinking. Rumor has it she was stalking Lew Morris, however, it turns out she was after money.

That's the first thing that would come to my mind, "I need money, so I think I will impersonate a DHHS employee." She didn't impersonate just any old DHHS employee; she claimed to be an "OIG Compliance Officer." When trying to surreptitiously relieve people of their hard earned money you think it would be best to impersonate a job that actually exists. She provided billing and compliance training, primarily to chiropractic organizations; another profound choice. But wait-there is more. You might be wondering, what did she teach the chiropractors? She taught them how to increase revenue. Just when you thought it could not get any stranger-there's more.

She decided to certify the attendees. Not just any old certification. She certified them as "Practice Compliance Officers." Yup, that fits. "I will teach you how to increase revenue and certify this skill by calling you a Compliance Officer." Does the phrase "O for everything" ring a bell?

Let me recap. A woman who wants money impersonates a DHHS "OIG Compliance Officer" to teach revenue enhancement to chiropractors and rewards attendees by certifying them as Compliance Officers. Of course you would think this absurd scheme would be uncovered immediately.

Unfortunately it took four years for someone to scratch their head and say, "Ya know Barney—this just doesn't look right." You must think I am making this up. Four years? It was all documented in a recently released report by the U.S. Attorneys office for the Southern District of Ohio. I have reread the report five times because I can't even believe what

I am writing.

Four years of this scheme; she must have made a bundle, you say? Wrong again. She made about \$17,000. As strange as it sounds, that may be her only saving grace. She faces a maximum of three years in prison. I doubt she will get much punishment. How bad can you beat up someone who is this confused and who gained so little? She will probably get a job writing skits for *Saturday Night Live*.

Is there a moral to this story. Probably about a dozen of them. The one that concerns me the most is the bogus certification program. This is not the only questionable certification for compliance professionals. There are others. This is the only one associated with a scheme that rises to the level of legal action. There are others that would not pass the National Organization for Competency Assurance (NOCA) standard for certification programs. The problem is that some credentials are of little value but they are not illegal. They are misleading and of questionable value but not a crime. No agency is charged with finding and exposing questionable certification programs. You would think, given the importance of and the nature of the compliance profession, someone would step up.

There are certification programs tied to the purchase of books and classes. Some even have "tests" put together with a couple of "experts." What happens when the company decides to stop selling the product or gets out of the business altogether? I have seen the long and arduous road to the development of a qualified professional certification program. I have read the NOCA standards. This reminds me of the memorable presidential debate when Dan Quail was told, "I have met a legitimate professional credential and you my friend, are no professional credential." (Edited for dramatic effect.)

The good news is that in time, credentialing programs of dubious value will fade away. It happened in other professions and it is happening in ours. I am sure some credentials have already disappeared. This problem will take care of itself. As the demand for their workshop/book dries up so

Continued on page 23



I have seen everything

...continued from page 18

will their credential. As people begin to question how the certification was developed, the demand for the certification will dry up. More mature professions have no more than one or two legitimate credentials, the others are gone.

This is a painful part of our professions evolution. It is a shame that this happens to good people. What will their credential be worth if no one recognizes its value? Time will take care of it; however in the meantime people will waste time, money and possibly their credibility. The question is not, "Why did it take four years to expose this absurdly bogus professional credential in Ohio?" The question is how long will it take to expose the rest? ■