Design a **Useable** Compliance Policy for Physician Practices

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APRIL 24, 2013

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**Short and Sweet**

- Compliance Policies **don’t need to be lengthy**.
- Say what you need to say and **use the policy**.
- **Mean what you say** – Forget the window dressing  
  **Don’t print things that you do not intend to follow!**
- Follow the **basic guidelines set forth by the OIG**  
  (don’t reinvent the wheel!)
- **Review** and **Revise** the policy **yearly**.

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**Who?**

- **Individual and Small Group Physician Practices.**  
  This is “voluntary” at this point in time.

The OIG has **not stated “when”** physician groups will be required to have a compliance policy in force.

However, many physician practices have implemented a compliance policy in order to assist their offices from “**submission of erroneous claims or engage in unlawful conduct…**”  
(Oct. 5, 2000 Fed. Register)
WHO?

- The OIG further states that although the October 2000 OIG Guidelines reference "small and large practice" the intent is for all physician practices that may not have the same type of resources (financial and staffing) as an institution (such as hospital or skilled nursing Home).

What?

- What specifics does the OIG suggest that a compliance policy should consist of?
  - Seven Basic Components:
    1. Conduct internal monitoring and auditing;
    2. Implementing compliance and practice standards;
    3. Designating a compliance officer or contact;
    4. Conducting appropriate training and education;
    5. Responding appropriately to detected offenses and developing corrective action;
    6. Developing open lines of communication; and

When?

- Now ~
  - The OIG has not stated "when" this voluntary recommendation will be made "mandatory" but it is just a matter of time....
  - HCCA has a social network where questions can be asked...
  - Know your resources!
Where?

- Where do you find the tools and resources you need to develop a compliance plan (beside the HCCA)?


Why?

- The OIG states that “voluntary compliance programs provide benefits to help prevent erroneous or fraudulent claims, but also by showing that the physician practice is making additional good faith efforts to submit claims appropriately.” (Federal Register, Oct. 5, 2000, Page 59435)

How?

- Let's start writing!

- If you have a laptop (or want to write) please feel free to start designing the template for your compliance policy —

- We are going to use the basic principals set forth by the OIG’s October 5, 2000 Guidelines
Page 1 of the Compliance Policy

• 1. The Name of Your Organization, Title of the Document and Today's Date.

• 2. Introduction as to “why” you are writing this policy (example is “code of conduct” or perhaps “goals” of this document.)

• 3. Statement about the “purpose” or intent of the new compliance policy.

Example of Page 1 of your New Policy

Heading: Bloink Community Physicians Compliance Policy
April 24, 2013

Code of Conduct: “Google” Code of Conduct for Healthcare Compliance and you will find many examples!

Compliance Program: Why do you want a Compliance Policy? What rules do you want to comply with? Are there specific steps / components to follow? Use the Federal Register, October 5, 2000 Vol 65, NO 194 as your guide!

Page 2 of the Compliance Policy

• 4. List the seven (7) elements / components from the Federal Register (October 2000) as the steps you will follow; and how you intend to follow those steps.

Example: Conduct internal monitoring and auditing through the performance of a periodic audit (Federal Register, step 1, page 59437.) The Director of Compliance will oversee that routine audits are performed on all Bloink Community Providers. The audit sample will be random and will include XXX, XXX, XXX.
• Continue to write about each of the seven (7) steps that the Federal Register describes. This is what the OIG recommends; and therefore should be in your policy.
• After each of the seven (7) steps, **briefly state how you plan on achieving that particular goal.**

**Example: Step 6: Developing Open Lines of Communication.** How does your organization propose to establish "open lines of communication?"
Page 4 of the Compliance Policy

- **Conclusion.** Use a *statement at the end* that wraps up this document.

  **Example:** With ongoing education, auditing and enforcement in the area of compliance, Bloink Community Physicians will strive to adhere to all state, federal and insurance (contracted) guidelines relating to legal and ethical practices.

Page 4 of the Compliance Policy- Cont.

- **End your policy** with an **Acknowledgement** that each provider and key management personnel sign.

  **Example:** I have read and agree to comply with the standards of this Compliance Plan. I agree to act ethically and to ask questions if I do not understand the Bloink Community Physicians Compliance Policy.

  Printed Name  Signature  Date

Questions?

- Look at the October 5, 2000 Federal Register (Vol 65, No 194) *that is attached* to assist you with completing your Compliance Policy outline!

- Feel free to ask questions or discuss what might have worked for you in your organization!

  *Thank you for participating today and I wish you well with the design of your new Compliance Policy!  J. Bloink*