Making Compliance Work in Physician Practices

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Locations

- Small Group Practices – few locations
- Market
- Regional
- National
Employed Physician Integration

Tenet Physician Resources – Compliance Coverage

Eastern Region- Central Division
# of Physicians= 1,082
Avg. # of employees= 2,705

- Eastern Region- Coastal Division
# of Physicians= 402
Avg. # of employees= 1,005

Western Region
# of Physicians= 266
Avg. # of employees= 610

- Texas Region
# of Physicians= 227
Avg. # of employees= 568
Topics and Takeaways

- How to Effectively Communicate Across Practices
- Training Methods for Practices
- Initiatives For Physician Practices

How to Communicate Across Practices

- Can be difficult due to makeup of organization
  - In Person
  - Remotely
- Difficulty in getting message to physicians
How to Communicate Across Practices

- Methods of Communication
  - Cascade down the message
  - Videos
    - New Hire Training
    - Annual Refresher Training
    - Specialized/Targeted
  - Web-ex sessions
  - Monthly re-occurring calls
    - Bi-Weekly Operations Call
    - Monthly Practice Managers Calls
      - Meeting recorded
      - Minutes taken

Training

It's like herding cats.
Training – It’s All About the Buy-in

- Three major ways to accomplish:
  - Live
  - Computer course with test
  - Video

Video Training
- New Hire Training
- Annual Refresher Training
  - Can incorporate multiple topics to reach all level of employee within the practice/enterprise
    - Physicians
    - Clinical staff
    - Billers
    - Coding
  - Add video from other sources to let the audience know this is a universal issue not just “us”
  - Put some humor in it/some variety into
Training Topics for Practices

- Sunshine Act
- Conflict of Interest
- Vendor Relationships
- Yates Memo

For example of OIG YouTube Video
- https://youtu.be/luFNmQ-6Jck

Physicians Conflict of Interest
- https://youtu.be/s0inbpEjcTI
Initiatives Impacting Physician Practices

➢ How we have addressed some of the unique issues with regard to Physician Practices

➢ How to get in front of potential issues before they are employed?

➢ How to vet new products/procedures?

➢ Coding issues?

➢ Prescribing issues?

Physician Practices Onboarding Checklist

➢ Imperative you know what you are getting before they are in the door.

➢ The “Who, What, When” or better put

➢ “What, Documented, Billed”
Initiatives Impacting Physician Practices

➤ Physician Practice Onboard Checklist

- LOI
- Due Diligence
- Credentialed
- IT Assessments
- Operations
- 0-4 Weeks
- 5-8 Weeks
- 9-12 Weeks
- 13-18 Weeks
- Operations Completion of Credentialed
- IT Assessments on the Ground

Onboarding is Not Complete until Billing Clearnce Audit Completed and Within Goal

Initiatives Impacting Physician Practices

Alternative Lines of Business

➤ Alternative Line of Business means any items and/or products that may not fit into traditional lines of service for the primary or specialty care practice.

➤ Examples –
- Supplements
- Cosmetic procedures and services
- Oncology infusion
Initiatives Impacting Physician Practices

Alternative Lines of Business

- Getting in front of it before they are hired
- Latest/greatest trend - colleague is doing it

Alternative Lines of Business Policy/Job Aid
Initiatives Impacting Physician Practices

Title: NEW AND ALTERNATIVE LINES OF BUSINESS REVIEW PROCESS

1. POLICY STATEMENT:
   "Alternative Lines of Business" means any new rates and/or products that may not fit into traditional lines of business in the pharmacy or specialty drug market, and that are excluded but not limited to the list of services described in the dates listed in this Policy.

2. PROCEDURE:
   A. Approval Process:
      1. Physician Practice Organizations will submit a Physician Practice Organizations (PPO) policy change. The change shall be submitted to the National Hospital Practice Organizations (NHPO) for approval.
      2. The Physician Practice Organizations will then submit the policy change to the National Hospital Practice Organizations (NHPO) for approval.
      3. After approval by the NHPO, the policy change will be submitted to the Market Review Team (MRT) for review.
      4. The MRT will then review the policy change and make a decision on whether to approve or reject the policy change.

   B. Services Identified as "Alternative Lines of Business":
      This policy includes the following services:
      1. Cash-based services including freestanding
      2. Services not routine for the physician specialty
      3. Diagnostic imaging including C, CT, MRI
      4. Experimental or investigational services
      5. Company IE risk services
      6. Domestic procedures and services
      7. Radiation Therapy
      8. Anesthesiology Services and Supplies
      9. Blood Banking/Pharmacy and Dispensary
      10. Compounding of medications
      11. Oncology infusion
      12. Supplements
      13. Weight management (non-traditional)
      14. Non-invasive tests such as electrocardiogram, echocardiography, ultrasound, urology, acupuncture, chiropractic, etc.

   C. Existing Practices:
      1. The new policy is not effective for existing practice periods prior to the effective date.
      2. Exceptional cases may exist where the practice is required by law or regulation.

   D. Compliance:
      1. Practice Providers shall comply with the new policy.
      2. Failure to comply with the new policy may result in disciplinary action.

   E. Effective Date:
      The new policy becomes effective [date].
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QUESTIONS