EVMS MEDICAL GROUP

Compliance Newsletter

August 2018 Volume 20, Number 8

In This Issue

Compliance Hotline

Type:

http://157.21.29.163/Compliance/

and click on Hotline.

EVMS Medical Group Compliance concerns may also be sent to the EVMS Medical Group Compliance Office via phone, mail or e-mail.

Timely Documentation and Signatures

CMS states that documentation must be signed and finalized at the time the service is rendered with no additional time "beyond the short delay that occurs during the transcription process". For patient safety reasons, it is very important to document at the time of the service so that all information is accurate and complete. If much time elapses between the visit and the completion of documentation, it will be difficult to provide an accurate summary. For billing purposes, no charges should be submitted for a service for which we have incomplete documentation or no documentation at all.

CMS' language on the timeliness of signatures and documentation completion has become more conservative over time. Previous guidance stated that the documentation should be completed within 5 days of the date of the service which then transitioned to "at the time of service or shortly thereafter". Because the guidance is moving in a more conservative direction, this is an important issue and we must be diligent in complying with these guidelines. EVMS Medical Group does provide some leeway on timely signatures when completing retroactive internal audits however we cannot be confident that CMS and/or other insurance carriers would provide the same leniency. For detailed information on CMS' signature guidelines please review the fact sheet published in May of this year:

MLN Fact Sheet: Complying with Medicare Signature Requirements

Verifying Patient Information

An important part of protecting patient information is verification of identity. Aside from checking all documents for matching demographics before mailing, scanning into a chart, or handing to a patient, there are other ways to protect as well. If a

Contact Us

EVMS Medical Group Compliance Office
4111 Monarch Way,
Suite 500
Norfolk, VA 23508
Phone 451-6200

Link to Policies & Forms:
http://www.evms.edu/patient_care/compliance_program/

James F. Lind, Jr., MBA
Compliance Officer

Privacy Office
Privacy Line 451-6298

Leanne Smith, CHC
Administrator

Laura Brower, CHC, CPC
Coding & Compliance Manager

Donita Lamarand, RN, BSN, CPHRM
Director of Risk Management

Andrea Willis, CPC, CPMA
Clinical Auditor

Compliance "Listserv"

Send an email to browerl@evms.edu to request to be added to the EVMS Medical Group Compliance "Listserv". Once you are subscribed, you will receive newsletters, information and training opportunity announcements directly.

patient presents in person, including for an appointment, it is important to obtain a Driver's License or other form of photo ID. If a patient designates someone to pick up PHI on their behalf a photo ID should also be requested to verify the identity of that individual.

When receiving items by mail, particularly signed forms requesting documentation or other information, the signature may be compared to a signature we have previously obtained from the patient for example on our registration form. If mailing records or other documents containing PHI to the patient, it is best practice to send to the address we have on file.

When verifying identity over the phone the patient's full name as well as two other identifiers such as date of birth, address, or phone number should be confirmed by requesting that information from the caller. For billing inquiries you may ask for the patients most recent date of service or for an invoice number. If ever in doubt about the caller's identity it is acceptable to ask if you might call the patient back and call the number on file in the record to verify.

e-PHI Security Tip

Disks and/or flash drives received from external places (to include patients) should not be connected to our network. We could pose a risk to the security of our systems without knowing what potentially harmful software those devices may contain. If a patient presents with records on a device it is best to ask them to keep the device and provide us with paper records or point us in the direction of the referring provider so that we may obtain directly from that practice.

It is also worth noting that a tactic of some hackers is to leave these devices in or around clinic areas to be picked up by unsuspecting staff members. The hackers load these devices with harmful or invasive software hoping to gain access to the users system. Please be diligent in the use of flash drives and disks!

Lunch Discussion Session September

Topic: 2018 ICD-10 Updates and Documentation Coding

Who Should Attend: Anyone involved in the documentation and code selection process. We will cover this year's ICD-10 updates which go into effect on October 1st and some common diagnosis code reminders.

Date and Location:
Thursday, September 20th, 12-1:00 pm in HH 758

Please RSVP to Andrea Willis at willisaj@evms.edu or 451-6275 and feel free to bring your lunch!