Office of University Compliance
Caroline Building
Room C130
3545 Vista Ave
St. Louis, MO 63104
314-977-5545

Upcoming Events:

HIPAA General Session:
December 16, 2010
3:00 p.m. LRC 110

PMO Annual Compliance Update:
December 8, 2010
10:30 a.m.
December 9, 2010
10:30 a.m.
December 15, 2010
10:30 a.m.
All sessions will be held at Drummond Hall Multi Media Room

SLU HIPAA Website:
www.slu.edu/hipaa

Center for Medicare & Medicaid Services:
www.cms.hhs.gov
wws.cms.gov/transmittals
/downloads/R1875CP.pdf

If you have any comments or questions regarding the Compliance E-News please contact Lynn Monahan at monahanl@slu.edu

Volume 1, Issue 4
November/December 2010

OIG Announces 2011 Work Plan

The Office of the Inspector General (OIG) recently published brief descriptions of activities planned to initiate or continue in audit efforts with respect to the programs and operations of the Department of Health & Human Services in fiscal year 2011. Target areas for Part B (Professional) services include:

- Place of Service Errors
- Part B Imaging Services
- Polysomnography and Sleep Studies
- Hospice Services
- Coding of Evaluation & Management (E & M) Services, specifically the
  - ✓ Type of E & M service -new vs. established; initial vs. subsequent; etc
  - ✓ Setting of E & M service – outpatient; inpatient; nursing facility; etc.
  - ✓ Complexity of E & M service - coding; level of service; medical necessity

Additionally, reviews will examine multiple E & M services for same providers and beneficiaries to identify electronic health record (EHR) documentation practices associated with potentially improper payments. Full details are available at: http://oig.hhs.gov/publications/workplan/2011/

Saint Louis University Compliance Help Line (877)525-KNOW (5669)

Q. I have some concerns regarding business, billing and ethical practices in my department. What resources are available?

Saint Louis University has high standards in conduct which encompass knowledge, skills, attitudes and actions. These standards are articulated in the *Shared Values for the Common Good (The 5C's) Competence, Conscience, Compassion, Commitment and Community.*

The Saint Louis University Compliance Policy supports these standards and outlines the availability of a confidential, toll-free helpline **(877) 525-KNOW(5669)** to be used by any individual who may have questions. The Compliance Policy further outlines the specific employee responsibility of reporting any action that may put SLU at risk in their business practices. Callers may choose to use the line anonymously but in all instances without fear of retaliation. Additionally, the helpline is answered 24 hr a day and in different languages, if warranted. At the completion of the call, the individual receives a call back date when they can check the resolution of the potential issue.

Q. It seems there are frequent headlines regarding government accusations of health care providers and organizations allegedly committing fraud in business practices. What are some examples of health care fraud and abuse?

The following are examples of potential fraud in the health care arena:
- ✓ Billing for services not provided
- ✓ Upcoding, i.e. billing for a service at a higher level than is medically necessary
- ✓ Insufficient/absent documentation in the medical record to justify billed services
- ✓ Falsifying medical records, i.e. indicating falsely that a particular health care professional was physically present for a procedure/service or documenting unverified information
- ✓ Billing for high level professionals when less qualified professionals are rendering the service
- ✓ Illegal remuneration (kickbacks) i.e., providing free office space for referrals, etc.

Saint Louis University Compliance Department

For further information or general questions regarding potential areas of compliance risk, please contact the Compliance Department staff at 977-5545.