SAINT LOUIS UNIVERSITY COMPLIANCE 877-525-KNOW

September

2015

Welcome……..
Cindy Stacy, CPC, CPC-I, CRC
Compliance Education Manager

Cindy comes to us from Humana where she was a coding educator. She conducted seminars on Medicare risk adjustment, webinars on various coding guidelines, and provided CPC boot camps. She has 9 years' experience in medical coding and auditing for multispecialty groups. She is certified in risk adjustment coding and is a certified CPC instructor. Outside of work, Cindy enjoys shopping for records, participating in 5Ks and going home to visit family and friends in her hometown of Rockford, IL. You can contact Cindy by phone: 977-5888 or email: stacyc@slu.edu

Reporting of Security and Privacy Incidents

"It is the responsibility of all University workforce to report suspected incidents of privacy or security."

Placards have been developed to provide workforce guidance about reporting incidents to IT Security or the Compliance Department. The Placards include examples of incidents that should be reported, contact information, and details of what information is necessary for follow-up.

Employees will receive a copy of the magnetized placard through inter-office mail in the next few days. Please display your placard in a prominently visible location so that it can be used as a reminder and reference for reporting incidents of security and privacy.

2015 Annual Compliance Update

Please remember that you now have access to the 2015 Annual Compliance Update via your MySLU portal under the "Compliance Requirements" box. This mandatory education initiative must be completed by **October 31, 2015.**

We want to send a special *Thank You* to those of you who have completed the training. We are now at over 55% completion! For those of you who have yet to complete the ACU, please do so at your earliest opportunity.

In order to ensure each department is on schedule to complete the update before the deadline, Compliance will begin to contact each department Chair and Business Manager and supply them with a departmental status report.

See the last page of the newsletter for instructions to complete the training.

Attestation (Linking) Statements
For E/M Services

We have closed the books on the FY2015 audit year and the Teaching Physician statement seems to be the topic we have had to educate both billers and providers on the most. According to the Centers for Medicare and Medicaid Services' (CMS) guidelines, the teaching physician must personally document their presence and the active role they play in the patient's evaluation and treatment.

Teaching Physicians are responsible for ensuring that patients seen by residents receive the same standard of care as if they were being seen solely by the Teaching Physician themselves. In order for a service to be payable in a teaching setting the Teaching Physician must personally perform key portions of the service or observe a resident performing those key components. Regarding E/M services, the Teaching Physicians is required to personally document at least the following:

- That they performed the service or were physically present during the key or critical portions of the service when performed by the resident; and
- The participation of the teaching physician in the management of the patient.

When assigning codes to E/M services billed by teaching physicians, reviewers will combine the documentation from the Resident and the Teaching Physician. Documentation by the Resident of the presence and participation of the Teaching Physician alone is not sufficient to establish their. Upon medical review, the combined entries into the medical record by the teaching physician and the resident constitute the documentation for the service and together must support the medical necessity of the service (CMS Manual System; Pub 100-04 Medicare Claims Processing).

An attestation statement, also known as linking or statement is necessary when a Resident is involved in the management and care of a patient. Based on guidelines from CMS, here are some examples of acceptable attestation statements:

- "I performed a history and physical exam of the patient and discussed his management with the resident. I reviewed the resident's note and agree with the documented findings and plan of care."
- "I was present with the resident during the history and exam. I discussed the case with the resident and agree with the findings and plan as documented in the resident's note."
- "I saw and evaluated the patient. I reviewed the resident's note and agree, except that... (The teaching physician would insert their exceptions to the residents' documentation at this time.)"
- "See resident's note for details. I saw and evaluated the patient and agree with the resident's finding and plans as written.

Based on guidelines from CMS, here are some examples of unacceptable attestation statements:
- "Agree with above.", followed by legible countersignature or identity;
- "Rounded, Reviewed, Agree.", followed by legible countersignature or identity;
- "Discussed with resident. Agree.", followed by legible countersignature or identity;
- "Seen and agree.", followed by legible countersignature or identity;
- "Patient seen and evaluated." followed by legible countersignature or identity; and a legible countersignature or identity alone.

The statements above are insufficient because the documentation does not make it possible to determine that the teaching physician was present, that they evaluated the patient, their review of the findings, and/or their involvement with the plan of care for the patient.
http://www.cms.gov/Regulations-and-Guidance/Guidance/Transmittals/downloads/R2303CP.pdf

If the teaching physician personally performs all the required elements of an E/M service and performs all the documentation themselves, they would not add the attestation statement. In the absence of a note by a resident, the teaching physician must document as he/she would document an E/M service in a nonteaching setting.

Changes Announced for Billers' Meetings

During the September 22nd Billers' Meeting Anne Garcia, Executive Director of University Compliance, announced that due to the new ICD-10 implantation, the Billers' Meetings will become a mandatory monthly session for all Billers, Coders and Auditors within the SLUCare practice. Please mark your calendars for the upcoming meetings:

October 20th
10:00-11:00am
LRC Aud. C

November 17th
10:00-11:00am
LRC 112

December 8th
10:00-11:00am
LRC Aud. B

Visit Our Newsletter Archive
click here

2015 Annual Compliance Update Instructions

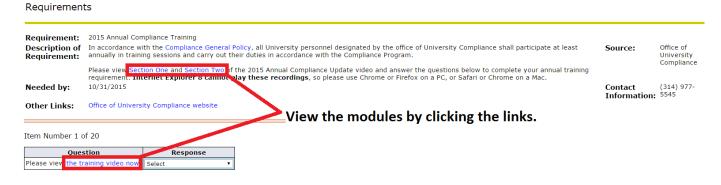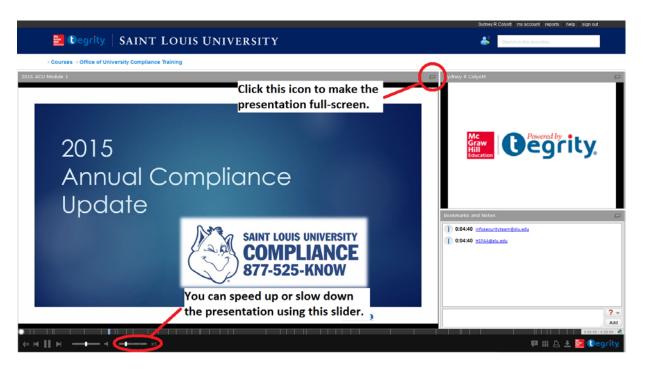## Use only Google Chrome or Mozilla Firefox to access the course.

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1. Log into **myslu.slu.edu**.

2. Go to the **Home Tab**.

3. Click on the **'2015 Annual Compliance Training'** in the box labeled **'Compliance Requirements'**. **(Note: If you have other outstanding requirements, you may need to complete them prior to gaining access to the Compliance course.)**

4. Click the **link** in the **Question Box** to access the first video. (A new tab will open and the video will begin playing automatically.)

5. **View the video**.

6. Close the video **tab at the top of your screen** after viewing the video.

7. Certify that you have watched the video using the **dropdown menu in the response box**.

8. Answer the questions associated with the video you just viewed.

9. Repeat steps **4 through 8** for module 2.

10. After viewing and completing the questions for both modules, choose **'I Acknowledge.'** from the **dropdown menu in the response box** and click **Submit**.

If you have problems viewing the videos, please contact IT at 977-4000.

If you have questions regarding the content of the presentation, please contact the Office of Compliance at 977-5545.