



SAINT LOUIS UNIVERSITY
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OFFICE OF UNIVERSITY COMPLIANCE

September 2017 Compliance Newsletter

The Complexities of Complying with OFAC Sanctions

While we often consider the impact of export controls limited to the shipment or transport of tangible items to foreign destinations, the highest risk area to Saint Louis University is interaction with sanctioned entities. Saint Louis University must be cognizant in avoiding “prohibited transactions” with individuals, countries, and organizations on the Office of Foreign Asset Control (OFAC) sanction list. Prohibited transactions include trade, financial transactions or other dealings that would provide benefit to the entity. As an academic community with continual international collaborations, travel, and vendors the risk of Saint Louis University engaging with one of the sanctioned entities is heightened. To mitigate this risk, the University Export Control Officer will review visitors, vendors, travel, and other collaborations to verify the Saint Louis University is in compliance with the OFAC regulations.

The OFAC sanctions have recently moved into sports when Mexican soccer star, and Mexican National team player, [Rafa Marquez](#) was placed on the OFAC sanction list for assisting a Mexican drug dealer. While not uncommon for individuals to be moved onto the sanction list, this move provides an interesting look into “[providing benefit...or services](#)” to someone on the sanction list. If the U.S. national team plays his Mexican national team during the 2018 World Cup the U.S. team would be “providing benefit” to someone on the sanctions list, thus violating U.S. export control regulations. During the 2018 World Cup the U.S. national team will need to request a general license from OFAC that would allow them to play the games. This brief example provides a glimpse into the complexities of the export control regulations.

If you have any questions about this story or general export control inquiries, please contact the Export Control Officer, Michael Reeves, at 977-5880 or Michael.Reeves@health.slu.edu

2017 Billers’ Meeting Schedule

All meetings will be from 10:00-11:00am
LRC-Pitlyk Auditorium C

October 10, 2017
November 14, 2017
December 12, 2017

ACU2017 News

As of September __, 2017, __% have completed the Annual Compliance Update for 2017.

Business Managers have been getting regular completion updates with the request that they remind their employees to complete the training as soon as possible.

Please check for any outstanding Compliance Requirements at myslu.slu.edu/home

Welcome New Employees!

All new employees of SLU are required to complete compliance training within 30 days of their start date. The module can be found on the “Compliance Requirements” section of your mySLU homepage.

The CODING CORNER

When documenting a billable service, the documentation of past, family, social history and/or review of systems can be linked to a prior visit as long as that visit is identified by date and location.

If the date and location of the source is not documented, it cannot be counted when leveling the charge. This will result in a down coded note.

For example:

"I have reviewed the patients past, family, social history and the review of systems from her 10/12/16 visit with Dr. Young. Patient states there have been no changes."

OR

"I have reviewed the patients past, family, social history as well as her review of systems from her 10/12/16 visit with Dr. Young. Patient states the only change is her mother's recent diagnosis of colon cancer."

Take a break, have a little fun ☺ I found this fun article on HeathcareDIVE.com

Which of the following ICD 10 codes are real? Which ones are made up?? Some of these are pretty bizarre. I find it hard to believe that some of these things have been reported so often, they actually have their own code!!

- Y92.146: Swimming-pool of prison as the place of occurrence of the external cause...
- S10.87XA: Other superficial bite of other specified part of neck, initial encounter. (A hickey!!)...
- W55.41XA: Bitten by pig, initial encounter...
- W220.2XD: Walked into lamppost, subsequent encounter...
- Y93.D: V91.07XD: Burn due to water-skis on fire, subsequent encounter....
- W55.29XA: Other contact with cow, subsequent encounter....
- W61.12XA: Struck by macaw, initial encounter. ...
- R46.1: Bizarre personal appearance. ...
- **V97.33XD: Sucked into jet engine, subsequent encounter....**



W56.22xA

Struck by orca, initial encounter

They are all real codes ☺ If you're looking for more fun ICD-10 codes, 'Struck By Orca' is a 66 page book, illustrating dozens of artists' visual interpretations of their favorite ICD-10 codes. There are also ICD-10 playing cards, posters, etc. You can check it out here www.icd10illustrated.com click on All products.