



SAINT LOUIS UNIVERSITY  
**COMPLIANCE**  
877-525-KNOW

## International Travel Updates

In recent weeks, several articles have announced that sanctions have been lifted on Iran and Cuba. While certain sanctions have been lifted for either of these countries, our ability to host visitors, travel, or engage in business with Iranian and Cuban nationals has not changed. Appropriate procedures must be followed to keep the university in compliance with federal export control regulations.

The full embargo and sanctions for support of terrorism continue to be in place for both Cuba and Iran. The federal government has suspended certain sanctions to allow more business interaction with the two countries, namely within the airline industry. However, the impact on U.S. educational institutions and our ability to freely travel or conduct business with the Iranian and Cuban government, businesses and/or nationals has

not changed. A federal authorization is required by the Office of Foreign Asset Controls (OFAC) before Saint Louis University, our students, faculty or staff can engage in imports or exports to Iran or Cuba.

OFAC has issued a number of general licenses that allow educational institutions to travel and bring in visitors from these two countries. For example, the recently issued General License D-1 expands the list of persons allowed to travel to Iran for higher education purposes, although the list remains extremely small. The University Export Control Officer will be able to assist in determining if a general license will suffice for your purposes or if an OFAC license will be required. Please contact Michael Reeves for additional information or questions: Michael Reeves, Export Control Officer  
[mreeves8@slu.edu](mailto:mreeves8@slu.edu)  
314-977-5880  
<http://www.slu.edu/general-counsel-home/compliance/export-controls>



## Cindy's Coding Corner

### Cerumen Removal Coding Tips

Code 69209 was added to the Auditory System-External Ear section of the 2016 CPT Codebook. This code allows billing for removal of impacted cerumen by *irrigation or lavage, unilateral*. Not to be confused with CPT 69210, removal of impacted cerumen *requiring instrumentation, unilateral*. Below are guidelines to keep in mind when billing for cerumen removal:

- When cerumen is removed from both ears on the same day append modifier 50 or append modifiers RT and LT (depending on payer policies).
- Codes 69209 and 69210 should not be reported together when performed on the same ear on the same day. Report the procedure with the most intensive time or skilled procedure.
- For cerumen removal that is not impacted, see E/M service code.

# Privacy Monitoring Update ~ FairWarning®

---

In a recent newsletter it was announced that Saint Louis University had invested in the acquisition of a new monitoring technology called FairWarning®. This tool will allow for automated monitoring of the University's electronic health record, Epic. It will be used to analyze activity in patient charts and assist in evaluating whether access was appropriate.

Activation and use of this tool in the monitoring process is scheduled to begin in March. The University workforce will be receiving communications in the coming days informing them of this initiative and their responsibility for safeguarding patient information. All individuals that have an Epic user account will be required to complete a short online education video that describes the FairWarning® monitoring process.

The purpose of the video is to increase awareness for patient privacy and inform the workforce of their obligation to only access patient information for legitimate job-related reasons. It will provide examples of inappropriate access with reference to policies, which include sanctions for non-compliance.

The goal of privacy monitoring is to ensure that Saint Louis University performs in a culture of compliance that protects patient privacy as we provide the best possible care to our patients.

## **Look for communications about FairWarning® monitoring in the coming days!**

*Patient privacy is everyone's responsibility.  
Only access patient information for legitimate job related reasons.*

### **2016 Biller's Meeting Schedule**

*All meetings will be  
10:00-11:00am*

March 8, 2016--LRC Auditorium C

April 12, 2016--LRC Auditorium C

May 10, 2016--LRC Auditorium C

June 14, 2016--LRC Auditorium C

### **COMPLIANCE HOTLINE**

Dr. Pestello recently announced the launch of the Cura program which is a resource to assist employees in addressing concerns about trust, respect, and working relationships within our community. One feature of the Cura program offers employees the ability to request assistance if they feel they are being treated disrespectfully. One way of requesting assistance is through a dedicated phone line (977-CURA).

The Compliance Office would like to remind our readers that the Compliance Hotline (877-525-KNOW) will continue to operate as a confidential resource for reporting activities that are inconsistent with regulatory policies and/or federal and state laws related to services provided by the University. The Cura phone line and the Compliance Hotline are two different mechanisms with similar purposes intended to support the University community.