



# COMPLIANCE E-NEWS

## Compliance Academy Concludes Inaugural Year

Since the initiation of the Compliance Academy by the Legal and Compliance Committee on January 19, 2011, more than 2,000 participants completed compliance courses.

The mandatory course for the year was the "2011 Compliance Update". This class was presented at 62 sessions with an attendance of 1,594 individuals. Highlights of the class included an overview of the prevention of fraud, waste and abuse; HIPAA privacy and security updates and some best practice recommendations for documenting in electronic health records. Feedback from the sessions was very positive.

For those who failed to complete the mandatory education session by 12/31/11 – one final amnesty session will be held on **Tuesday, February 7, 2012 at 5:00 p.m.** in the Learning Resources Center (LRC) Auditorium B. The final attendance report will then be submitted to Dean Alderson and all clinical department chairs and business managers.

The 2012 Compliance Academy Course listings and mandatory course requirements will be published in future Compliance Newsletters and through email announcements. Planned course topics include research compliance, teaching physician regulations, documentation & coding, advanced topics in privacy and security, and electronic health record best practices. An eLearning course is also in the works for 2012. Suggestions for classes are welcome as are volunteers to serve as faculty members! Please contact the Compliance Department at (314) 977-5545 or via email at [slucompliance@slu.edu](mailto:slucompliance@slu.edu) with feedback, suggestions or to volunteer.

Congratulations and Thank You to all who participated in the Compliance Academy courses!

## RAC News Flash

The purpose of the Recovery Audit Contractor (RAC) Program is to identify and recover improper Medicare payments—both overpayments and underpayments—made to providers under fee-for-service Medicare plans. Demand letters are sent to providers when discrepancies are identified.

The Saint Louis University RAC Response Team continues to review all demand letters, pertinent provider documentation and follows up with formal correspondence to the recovery audit contractor. Often we are able to appeal the denials successfully. In addition, the Team analyzes the RAC data to identify trends and provide feedback to providers, the PMO and billing staff members regarding ways to improve or strengthen billing and documentation practices.

As of January 3, 2012, the Centers for Medicare & Medicaid Services (CMS) transferred the responsibility for issuing demand letters from its recovery auditors to its claims processing contractors.

CMS explained the change was made to avoid any delays in demand issuance. CMS outlined these changes in the official instruction (CR7436) issued to Medicare contractors (<http://www.cms.gov/Transmittals/downloads/R202FM.pdf>.)

As a result, Medicare contractors are now responsible for fielding any administrative concerns such as timeframes for payment recovery and the appeals process. The recovery auditors should be contacted for any audit specific questions, such as their rationale for identifying the potential improper payment.

For SLUCare providers, this means our Region D recovery auditor, Health Data Insights, Inc. (HDI) will no longer send RAC letters and our Medicare contractor, Wisconsin Physician Services (WPS), will assume the responsibility.

Please examine all communication letterhead you receive and forward any **WPS / RAC** demand letters to the PMO: Attn: Joan Sidiropoulos [jsidirop@slu.edu](mailto:jsidirop@slu.edu) or fax (314)977-6790.



If you have any comments or questions regarding the Compliance E-News please contact Lynn Monahan at [monahanl@slu.edu](mailto:monahanl@slu.edu)