



SAINT LOUIS UNIVERSITY

Office of University Compliance

# COMPLIANCE E-NEWS

HAPPY (ACADEMIC) COMPLIANCE NEW YEAR!

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Welcome to all new faculty, residents and staff, and to all “seasoned” practice members. Best wishes as we begin the academic and fiscal New Year! We are pleased to share the following important information about compliance education:

1. New Faculty/Clinician General Compliance Session – **required** for all providers that bill for services – physicians, nurse practitioners, physician assistants, etc.
2. Health Insurance Portability and Accountability Act (HIPAA) General Education Session – **required** for all faculty, staff, students that work with/are exposed to protected health information. Session dates and times will be listed on *SLU NEWSLINK*.
3. Resident/Fellow Sessions – Recently we have had the privilege of participating in Grand Rounds presentation for some departments. Topics included documentation and coding, general compliance issues, medical necessity, specialty specific topics, EHR documentation, and HIPAA updates. We welcome the opportunity to participate in education and interaction with the faculty and housestaff.
4. Billing and Coding Compliance Meetings - are held bi-monthly on the third Tuesday of the odd numbered months from 10:00-11:30 am. The session generally offers continuing education units (CEU's) from the American Academy of Professional Coders (AAPC). The next meeting will feature, “Coding Clinic” on Tuesday September 18, 2012.

To schedule any of these sessions please feel free to contact the Compliance Department by phone 977-5545 or email [slucompliance@slu.edu](mailto:slucompliance@slu.edu)

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### ***General Compliance Tips and Reminders***

**Medical Students** For billing documentation purposes, medical students can only provide documentation of *ROS* (Review of Systems), and *PFSH* (Past, Family and Social History). Residents and teaching physicians must document the *HPI* (history of present illness), *Exam* and *Medical Decision-Making*

**Procedures** require documentation of teaching physician presence throughout the entire procedure or for “critical or key portions”. Overlapping procedures may not have overlapping critical or key portions. When procedures overlap, the primary (TP) surgeon must identify the designated teaching surgeon who is immediately available as the backup surgeon for the first case.

**Medical Necessity** is defined as care or services deemed necessary and reasonable for the diagnosis or treatment of illness or injury, or to improve the functioning of a malformed body member. Documentation of medical necessity must be done before diagnostic services can be performed. Reason(s) for the exam, specific to the individual patient must be documented. An appropriate diagnosis code (ICD-9) must be provided or linked to the diagnostic service.

**HIPAA questions** regarding release of medical record information, authorization forms, policies and procedure please contact our medical record experts at 268-7010 or the Privacy Officer (Ron Rawson) at 977-5884 or [rawsonr@slu.edu](mailto:rawsonr@slu.edu)

**Government audits** continue with initiatives to fight fraud and abuse. As a result, scrutiny of provider services and claims for Medicaid beneficiaries are expected to increase. If contacted by letter or a representative from Medicaid or the Center of Medicare or Medicaid Services (CMS) requesting information, contact the SLU Compliance Department at 977-5545.

**Saint Louis University Compliance Hotline** is a toll-free hotline answered 24 hours a day, seven days a week by a company not directly affiliated with the University. At any time, an individual may register concerns relating to compliance, University business or research matters to their supervisor, the Office of University Compliance, or the hotline at **1-877-525-KNOW (5669)**. When using the hotline, callers may remain anonymous. University policy protects against discrimination and retaliation for reporting concerns in good faith.