



The Supplier Perspective Tactics for Survival

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The Road to Compliance

- Conscious Decision
- Company Investment
- Total Commitment



The ROI = Retained Funds

Achieving Compliance

1. Do you have a "designated driver" ?
2. Are you tested on the guidelines?
3. Does your firm "embrace" the rules or promote shortcuts?
4. Are your files internally audited?
5. Do you educate your referrals?

Mounting Issue

- Audits Will **Increase**
- Audits Will Be **Relentless**
- Audits Will **Hit** Your Business

Protection

- Do you have a Corporate Compliance Program?
- Is it on a shelf?
- Is it a state of mind?

Quote

“Take ownership of Compliance and 95% of your problems will be solved!”

Jeff Baird, Esq.
Chairman, The Healthcare Group
Brown and Fortunato

It's Possible!

- **Reduce** documentation analysis errors
- **Reduce** misinformation to referrals
- **Retain** earned dollars
- **Raise the bar within your business**

Tools

- Policy Training on LCD's
- Checklists
- Pre-Pay QA Process
- Post-Pay Internal Audits



LCD Training

- Read
- Distribute and Discuss
- Test for Measurement Outcomes
- Update as LCD's are updated

Use Checklists

- Don't rely on memory!
- Develop your own Checklists
- Review DME MAC D model:
 - <https://www.noridianmedicare.com/dme/coverage/>

Quality Assurance Checks

- Ongoing Process: Intake - Billing
- Need Detail Oriented Staff
- Use Specific Markers
- Find/Train/Correct Issues before audited!

Compliance Quick Tip PMD DOCUMENTATION



- **Must** receive 45 Days from Face to Face Exam
- **Must** provide 120 days from receipt date or 180 days from ADMC approval date
- **Must** prove date received
 - Date Stamp
 - Fax Date
- **Must** have prior to delivery

Compliance Quick Tip PMD 7-Element Order Date



- Date **MD completes** patient exam and functional evaluation
- Date **MD concurs/signs/ dates** specialty eval report
(if pt. was seen previous to clinical eval)
- Date **MD sees patient and concurs/signs/dates** specialty eval report
(if pt. was not seen previous to eval)
- **Discharge Date** from skilled facility
- **NOTE:** If pt. is referred to a clinic with an MD, can be completed by that MD on same date...Clinic MD is prescribing physician

Compliance Quick Tip PMD 7-Element Order Information



- Beneficiary Name
- Description of Item ordered
- Date of Face to Face Examination
- Pertinent DX/conditions requiring PMD
- Length of Need
- Physician Signature
- Date of Physician Signature

Compliance Quick Tip Manual Wheelchairs



- **Need Algorithmic Approach and reasoning for level of chair within the medical record**
- **Verbal Order OK, but must be documented:**
 - Description of Item
 - Beneficiary Name
 - Physician Name
 - Start Date
- **Valid Written Order on file prior to filing claim:**
 - Beneficiary Name
 - Detailed Description of Item(s) to be dispensed
 - Treating MD signature/Dated
 - Start Date

Compliance Quick Tip Repairs



- Intake Questions VERY Important
- K0462 – Temporary Replacement Billing

Suggestion:

- File Assignable if you sold the PMD
- File Non-Assigned if not your sale – Use ABN

Compliance Quick Tip Wheelchair Seating and Positioning



- Detailed Written Order signed/received prior to delivery if not sold with base chair
- Detailed Product Description necessary when provided with power wheelchair
- Patient must qualify for mobility device
- Medical Record must reflect need
 - Past and Present History Important



Uphill Battle #1

Physician Education

- Requires Understanding of Policy
 - Requires Supplier Outreach
 - Requires Supplier Ability to Communicate
 - Requires Supplier Synergistic Approach
- and**
- Requires Staff ability to Interpret and Apply Policy



Uphill Battle #2

Advertising Practices – TV/Mail

- **Implies** product is “free”
- **Implies** company is Industry Standard

What should a compliant provider do?

Report Fraud

By Phone:

- 1-800-HHS-TIPS (1-800-447-8477)

By Fax:

- 1-800-223-8164
(no more than 10 pages please)

By E-Mail:

- HHSTips@oig.hhs.gov

By Mail:

- Office of the Inspector General
HHS TIPS Hotline
P.O. Box 23489
Washington, DC 20026



Uphill Battle #3

CMS’s Perception of Industry is:

- Due to Audit Outcomes
- Due to Abusive Billing
- Due to Fraudulent Behavior

PERCEPTION IS REALITY

Raising the Bar

- Cooperative EFFORT
- POLICE the Industry
- REPORT non-compliant activity
- Resonate COMPLIANCE within your firm
- Be PRO-ACTIVE



Innovation

*When you change the way you question things
the things you question change...*

unknown author


