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?**

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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

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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