RADIOLOGY
Compliance Introduction

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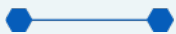
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- Compliance
- Compliance Hotline
- False Claims
- Medical Necessity
- Security Reminders

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- Increased scrutiny of health care providers
- Providers are targeted for audits
- Different rules for teaching institutions
- Follow all established guidelines, mandated rules & regulations
- Do the right thing
- Everyone's responsibility

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To prevent, detect and correct any violations of the rules and regulations

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Compliance's Role

We offer:

- Resources
- Latest information
- Overview of coding & documentation guidelines & rules
- Internal Audits/Reviews
  o New providers – (random review)
  o Risk based reviews
- Yearly Education at Department Faculty Meetings
  o Mandatory annual computer-based training (CBT) for all UW Health Team Members
- Work with auditors and payers so you don't have to

Effective lines of Communication

1. UW Health Compliance Hotline: (608) 821-4130 or (888) 225-8282

2. Email: businessintegrity@uwhealth.org

3. Electronically: U-Connect >[Compliance Report](#)
   - Can submit concerns or questions anonymously

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No

Two separate departments that have different functions & responsibilities

- They work collaboratively on your behalf

- Compliance Analyst – Professional Services Compliance

  - Responsible for all reviews, audits, research and support

- Specific coding coordinator and coding team for your department

  - Department coding team responsible for day-to-day coding and department questions

False Claims Act
Important Federal Law

- Protects the Government from being overcharged & makes it illegal to submit false or fraudulent claims

- You are an important part of protecting the integrity of the program
  - The Government needs billing providers to understand the laws in order to prevent fraud, waste & abuse

- You do not have to intend to defraud the Government to violate this law

- You can be punished if you act with deliberate ignorance or reckless disregard of the truth
  - You cannot hide your head in the sand

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- Inaccurate or incomplete documentation

- Upcoding

- Not medically necessary

- Billing for services not provided

- Billing for services covered by another payer

- Employing someone who has been excluded from the Program

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Medical Necessity

- Medical necessity is the overarching criterion for all services provided

- Perform, provide & document what is medically necessary

  - Use department/organization created templates & smart phrase
  - Ensures compliant documentation
  - Reach out to coding/compliance to assist with any new documentation requests

- Document in compliance with all federal & state laws, UW Health policies, medical staff rules & regulations and all applicable regulatory requirements

- Your faculty physicians, along with your documentation, are ultimately responsible for everything documented in your progress note

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Data Replication

Policy 6.47

Data Replication Policy 6.47 "Copy & Paste"

Some copy/paste techniques lead to lengthy, unreliable notes that contain duplicative, outdated and/or inaccurate information

<p style="text-align:center; color:red">Use Copy/Paste with caution!</p>

Recommendations:

➢ Avoid copying & pasting notes that are already in other sections of Health Link

➢ If/when information is copied, **ALWAYS** update, review and verify copied information for accuracy and medical necessity

➢ This includes copy/forward functionality

Consequences - Inaccurate copied information:

➢ Could lead to patient safety issues, and decrease quality scores

➢ Could lead to chart integrity issues and/or incorrect reimbursement

❖ Remember: **You are ultimately responsible** for documentation, including copied & templated documentation

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Data Replication Policy 6.47 "Copy & Paste"

Specifically Prohibited:

🚫 Copying from one patient's note *to another* patient's record

- Epic will display a warning
- Do <u>not</u> proceed with copying when this warning pops up

🚫 Copying information entered by medical student/APP student

☑ Co-sign Addend when using documentation for billing purposes

- <u>Specific documentation and supervision requirements</u>
- Guidelines must be followed to use their documentation for billing
- System wide created smart phrases to use for students

☑ Co-sign Attest when using documentation for education purposes only

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Security Reminders

Security Reminders

- ## Do NOT share your pass phrase!

  - Keep confidential
  - It is a breach to share your pass phrase/login with anyone
  - It is a breach to use another individual's login credentials to gain access to UW Health Systems
  - UW Health holds you personally responsible for confidentiality and use of your credentials

- ## Pass phrase should not be written down

- ## NEVER allow anyone to operate your computer under your login

- ## Always log out/lock your computer when you step away

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Questions?

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