American Association of Oral and Maxillofacial Surgeons

presents

Navigating and Surviving a Practice Audit

Webinar
Wednesday, November 16, 2016
2:30 pm-4:00 pm Eastern
1:30 pm-3:00 pm Central
12:30 pm-2:00 pm Mountain
11:30 am-1:00 pm Pacific

Presented By:
Judith P. Nelson

2016 Navigating and Surviving a Practice Audit
Faculty and Planner Disclosure

The American Association of Oral and Maxillofacial Surgeons (AAOMS) is accredited as a provider of continuing medical education by the Accreditation Council for Continuing Medical Education (ACCME) and is recognized as a provider of continuing dental education by the American Dental Association Continuing Education Recognition Program (ADA CERP). The AAOMS adheres to the ACCME accrediation requirements, including the Accrediation Critiera, the ACCME Standards for Commercial Support and the ACCME policies, and the AAOMS adheres to the ADA CERP Standards and Procedures in its development and delivery of continuing medical and continuing dental education activities.

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The following faculty have reported that they have no industry relationships to disclose:

Nelson, Judith

Planning Committee Disclosures

In accordance with ACCME guidelines, the following disclosures are provided for members of the AAOMS Board of Trustees, AAOMS educational planning committees and AAOMS staff. Members of the groups identified below have participated in the planning, development and implementation of this educational activity.

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The following members of the AAOMS Board of Trustees have reported that they have no industry relationships to disclose:

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Nelson, Steven R., DDS, MS
Nelson, William J., DDS
Rafetto, Louis K., DMD
Tiner, B.D., DDS, MD

Committee on Continuing Education and Professional Development (CCEPD)

The following members of the CCEPD have reported the following industry relationship disclosures:

Kademani, Deepak, DMD, MD
Zimmer Biomet: Consultant; Vista Dental: Research Grant; Elsevier: Royalties

Miloro, Michael, DMD, MD
Axogen, Inc.: Consultant

The following members of the CCEPD have reported that they have no industry relationships to disclose:

Busino, Lawrence, DDS
Grogan, David M., DDS, MSD
Hudson, John-Wallace, DDS
Meara, Daniel, MS, MD, DMD
Park, Chan, DDS, MD
Sabino, MaryAnn C., DDS, PhD
Schreiber, Andrea, DMD
Shafer, David, DMD
Shah, Gaurav, DMD
Steinberg, Mark J., DDS, MD
Waite, Peter D., DDS, MD

Committee on Health Care Policy, Coding, and Reimbursement (CHCPCR)

The following members of the CHCPCR have reported the following industry relationship disclosures:

Pietz, Wendy M., MS, DDS
Merge Healthcare (division of IMB Watson): Spouse, Employee

The following members of the CHCPCR have reported that they have no industry relationships to disclose:

Asdell, Bernard J., DDS
Batal, Hussam, DMD
Banks, Kathy A., DMD
Boyle, James M., DDS, MS
Candelaria, Lionel M., DDS
Everts, Joshua E., DDS, MD
Gossett , Donald L., DDS
Hillgen, John J., DMD, MBA
Kaye, Alan H., DDS
Massaro, Anthony, DMD
Mercer, James E., DDS
Mulrean, Joseph C., DMD
Nustad, Robert A., DDS, MS
Pitts, Adam S., DDS, MD
Startzell, James M., DMD, MS

AAOMS Staff

The following members of AAOMS Staff have reported that they have no industry relationships to disclose:

Adams, Mark, JD
Armour, Yolanda
Bonfield, Heidi
Choyke, Barbara S., CAE
Farrell, Scott C.
Hayson, Beth
Jones, Samantha E.
Kremer, Jolene

Lee, Caroline P.
Murray, Shannon
O'Brien, Kelly
Peterson, Shannon
Schnitzer, Mary
Serpico, Patricia
Teplitz, Janice K.
Wittich, Karin K.

All reported relevant conflicts of interest have been resolved by the Committee on Continuing Education and Professional Development and other planning committees as of 3/09/2016.

Navigating a Practice Audit

Judith Nelson Director, Business Solutions
DST Health Solutions, Inc.

Agenda

- Regulatory Landscape
- Preparing for an Audit
- Methodology & Process
- Managing an Audit
- Questions & Answers

National Health Expenditures

$3 Trillion

2/3

Per capita: $9,523

17.5% of GDP

http://www.cdc.gov/nchs/fastats/health-expenditures.htm
http://www.pnhp.org/news/2016/january/government-funds-nearly-two-thirds-of-us-health-care-costs-american-journal-of-pub

National Health Expenditures Dental Services

- $113 Billion
- 2.8%
- ½ Private Insurance
- 40% Out of Pocket

https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/NationalHealthExpendData/Downloads/highlights.pdf

Government Sponsored Programs Enrollment

- Medicaid - 72.8 Million
- Medicare Advantage – 17.6 Million
- Market Place – 12.7 Million

Polling Question:

What is the most common type of insurance for the patients that you serve?

Multiple selections are appropriate:

A. Self-Pay
B. Commercial
C. Marketplace
D. Medicare Advantage
E. Medicaid/CHIP

Compliance Program Requirements

- Provider Practices
- Medicare Advantage
- Qualified Health Plans
- Medicaid/CHIP

https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNEdWebGuide/Downloads/MLN-Compliance-Webinar.pdf

https://oig.hhs.gov/authorities/docs/physician.pdf

Question:

Have you established a comprehensive Compliance Program for your office?

A. Yes
B. No

Elements of Compliance Program

- Policies & Procedures
- Compliance Oversight
- Training & Education
- Effective Communication
- Disciplinary Standards
- Auditing & Monitoring
- Corrective Actions

Health Care Fraud & Abuse Control 2015 Annual Report

Judgements & Settlements
- $1.9 Billion

Criminal Investigations
- 983

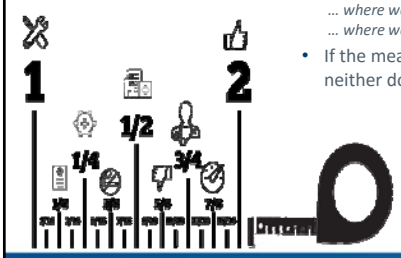
Civil Investigations
- 808

Convictions
- 613

https://oig.hhs.gov/publications/docs/hcfac/FY2015-hcfac.pdf

What gets Measured gets Done!

- Measurement means tracking …
  - *… where we have been*
  - *… where we are*
  - *… where we are going*
- If the measures don't change, neither do the results!



Measurement in Healthcare

- **4 Common Use Cases for Performance Measures**
  - Quality Improvement 69%
  - Public Reporting 64%
  - Payment
  - Accreditation, Certification, Credentialing and Licensure
- **7 Core Measure Domains in Use**

Most Common 93%

Structural	Access	Process	Outcome
Safety	Costs	Patient Experience	

Least Common 24%

- **Claims most common data source**

Source: RAND Health, Technical Report, "An Evaluation of the Use of Performance Measures in Health Care," 2011

Whistleblowers

- Protections
- Rewards & Incentives

http://www.insurancefraud.org/statistics.htm

Key Strategy #1

- **Educate! Educate! Educate!**: Regulations, standards, objectives and even practical application are in constant motion
  - All stakeholders need some level of understanding
  - Multi-dimensional approach
- **Result: Buy-in, Support, Collaboration**
- **Establish Ongoing Assessment**

Agenda

- Regulatory Landscape
- Preparing for an Audit
- Methodology & Process
- Managing an Audit
- Questions & Answers

Question:

Have you undergone a practice audit within the last twelve months?

A. Yes
B. No

Elements of Compliance Program

- Policies & Procedures
- Compliance Oversight
- Training & Education
- Effective Communication
- Disciplinary Standards
- Auditing & Monitoring
- Corrective Actions

Fully Integrated Compliance Model

Documentation

Documentation to demonstrate the program effectiveness can include:

- Policies & procedures
- Workflows and job aides
- Training materials & records indicating employee participation
- Monitoring reports
- Committee charters, meeting agendas & minutes
- Corrective action plans & audit reports

Audit Preparation

- Evaluate Contracts
- Understand Requirements
- Assess Documentation

Evaluate Contracts

- Audit Rights
- Frequency
- Medical Record Copying Fee
- Dispute Resolution

Understand Requirements

- Reimbursement Methods
- Private or Government
- Industry Practice

Assess Documentation

- Record Keeping
- Coding Practices
- Appointment Logs
- Confidentiality

Key Strategy #2

- **Preparation Pays!**: Contracts, regulations and standard industry practices establish the framework
  - Strive for Consistency
- **Result**: **State of Audit Readiness**
- **Establish Standard Procedures**

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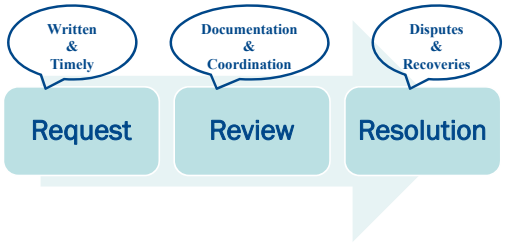
Audit Methodology

The Three R's of the Audit Process



Agenda

- Regulatory Landscape
- Preparing for an Audit
- Process & Methodology
- Managing an Audit
- Questions & Answers

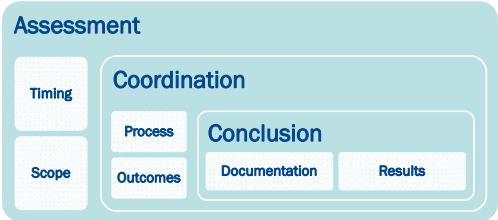
The Day Arrives.....

- Assess
- Prepare

Sample Agenda

- Entrance Conference
- Record/Documentation
  - Selection
  - Collection
  - Review
- Issue Resolution
- Audit Findings
- Exit Conference
- Audit Report

Managing an Audit



Key Strategy #3

- **Compliance Programs Work!**: A well documented program establishes supporting documentation to demonstrate processes.
  - Policies are Unique for *Your* Office
- **Result: Integrated Compliance Model**
- **Repeatable well defined processes**

THANK YOU!

Judith Nelson
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