

Your Quick Guide to HealthCare Compliance

Maintaining compliance in your practice isn't just a one-and-done kind of thing. In order to keep your business running profitably and accordingly, it's important to keep certain tips in mind while doing business:

1. Procedures and policies must be reviewed (at least) annually.

Although the policies in place are one of the most important facets of your business, they're often overlooked as time goes on. Procedures and policies shouldn't just be referenced as needed, they should be periodically revisited, updated and practiced.

2. Before digital communication, make sure proper security measures are in place.

Every single member of your team has a responsibility to your patients to keep their privacy safe and secure. Thus, it's important to keep the minimal amount of patient information stored online. Make sure a disclaimer is included on all emails and faxes to notify the patient/recipient of security measures and potential associated risks. Your organization stays safe, and your patients feel protected.

3. Frequently update your passwords.

Year after year, outdated passwords are one of the main causes of data breaches within corporate networks. You've heard it countless times before, but passwords should be a combination of capital letters, lowercase letters, and characters. The crazier the combo, the better. Hackers work hard from all corners of the earth, so it's important to keep their determination in mind when creating your password.

Efforts to maintain healthcare compliance in the U.S. have continued to grow. Because of these increased efforts and continuous cyber security threats, it's more important than ever to revisit your organization's compliance basics regularly.

With these tips in mind, follow our simple **guide to the ABCs of maintaining compliance** within your organization:

- A.** Conduct periodic reviews of policies, procedures, and controls.
- B.** Consult with legal resources.
- C.** Verify that appropriate coding policies and procedures exist.
- D.** Verify that appropriate overpayment policies and procedures exist.
- E.** Integrate mission, vision, values, and ethical principles with code of conduct
- F.** Maintain compliance plan and program.
- G.** Assure that a non-retribution/non-retaliation policy exists.
- H.** Maintain policies and procedures for internal and external compliance audits.
- I.** Verify maintenance of a record retention policy.
- J.** Maintain a code of conduct.
- K.** Verify maintenance of:
 - 1. A conflict-of-interest policy
 - 2. Appropriate confidentiality policies
 - 3. Appropriate privacy policies
 - 4. Policies and procedures to address regulatory requirements (e.g., the Emergency Medical Treatment and Labor Act (EMTALA), Clinical Laboratory Improvement Amendments (CLIA), Anti-Kickback, research, labor laws, Stark law).
- L.** Verify appropriate policies on interactions with other healthcare industry stakeholders (e.g., hospitals/physicians, pharma/device representatives, vendors).
- M.** Assure policies and procedures address the compliance role in quality-of-care issues.
- N.** Verify maintenance of a policy on gifts and gratuities.

- O.** Verify maintenance of standards of accountability (e.g., incentives, sanctions, disciplinary policies) for employees at all levels.
- P.** Maintain a Compliance Department operations manual.
- Q.** Verify maintenance of policies on waivers of copayments and deductibles.
- R.** Assure governance policies related to compliance are appropriately maintained.

Source:

1. HCAA-OIG, 2017