



TO: Vice Presidents
Chairmen
Section Chiefs
Faculty
Residents
Executive Administrators
Section Administrators
Managers

FROM: Krista Curell - Vice President, Chief Compliance

RE: Annual Health Care Integrity Program (Compliance) Announcement

DATE: February 2, 2011

I. Introduction

The University of Chicago Medical Center ('Medical Center') is committed to fostering a corporate culture of ethical behavior and integrity in all matters related to compliance with the laws and regulations that govern the delivery of healthcare. In order to support this commitment, the Medical Center established a Health Care Integrity Program ('HCIP') that promotes good business conduct by emphasizing compliance with billing, coding, documentation, patient privacy, and conflict of interest requirements. The Office of Medical Center Compliance ('OMCC') administers the HCIP and is responsible for giving employees and faculty the information and tools necessary to adhere to the framework of laws, regulations, and rules that are applicable to their job responsibilities.

The OMCC maintains an ambitious schedule of auditing, monitoring, education, and outreach to generate awareness among Medical Center employees and faculty about billing compliance and patient privacy risks. The three main HCIP initiatives that may impact you or your department in 2011 are described in detail below.

II. Documentation Audits

The physician and non-physician provider documentation audits are designed to validate that providers understand fundamental billing, coding, and documentation concepts set forth by the Centers for Medicare and Medicaid Services (CMS). Specific to physicians, these concepts include but are not limited to precise expectations regarding presence and participation for physicians who work with residents and fellows. Our subjects are

selected for audit based on risks identified internally or via the annual Office of Inspector General's (OIG) Work plan.

In addition to the physician and non-physician provider documentation audits described above, the OMCC 1) maintains an annual audit schedule that assesses compliance with aspects of the billing, coding, and documentation process beyond physician documentation, 2) responds to audit requests from government and oversight agencies, 3) and makes recommendations about long-term process improvement.

We are excited about our recently implemented new auditing software - MDaudit Professional – that will greatly enhance the number of services we are able to audit while also providing more timely and informative audit result reports. As previously mentioned, the auditing and monitoring of an institution as large as UCMC poses some challenges for a small audit group. The implementation of this software will aid in the development of a streamlined audit practice that will eliminate some of these challenges while providing additional enhancement. It will allow us to:

- √ **Improve audit productivity,**
- √ **Increase audit quality,**
- √ **Quickly identify areas of concern,**
- √ **Monitor audit status across departments, and**
- √ **Enhance provider education.**

If your documentation is selected for audit, then you will be notified in writing by Tomicia James, Director of the Audit and Education Services team, prior to initiation of the audit and then again to communicate the audit findings. For more information about the audit program, contact Tomicia James at extension 4-1143.

III. Annual Mandatory Fraud Awareness Education

The OMCC engages in a wide range of outreach initiatives that are designed to maintain visibility of the HCIP principles among the workforce. The cornerstone of this outreach is the annual Fraud Awareness education program. This program is mandatory for faculty, residents, and all staff who are involved in the professional fee billing process and facility fee evaluation and management documentation. **PLEASE NOTE that effective 1/1/2011, our annual compliance Fraud Awareness training obligation timeline will be moved from a calendar year track with a November deadline to a fiscal year track with a June 30th deadline. For fiscal year 2012 the training season for fulfilling Compliance Fraud Awareness credit will begin 7/1/2011 with a completion deadline of 6/30/2012.**

The Fraud Awareness curriculum includes updates on a variety of pertinent topics including coding, documentation, teaching physician rules, Anti-kickback and Stark principles, conflict of interest, and relationships with industry. The OMCC offers a variety of options for fulfilling the annual mandatory Fraud Awareness requirement including live sessions that are customized by specialty, monthly compliance sessions (variety of topics including coding and documentation or regulatory updates), online training programs, and audio conferences. In a typical year, the OMCC offers at least 40 live session programs and 30 audio conference events in addition to the online program. The number of live sessions that we offer is limited, so if you wish to have a live session for your department, please contact us in May 2011 to discuss your scheduling options

for FY12. The determination for which specialties will be offered a live session will be based on past attendance trends and risk mitigation initiatives.

Our online compliance training modules include updates that are provided on an annual basis and become available beginning July 1, 2011. Updated information on the Physician Quality Reporting Initiative (PQRI); Recovery Audit Contractors (RAC); and information on changes and revisions in the 2011 IPPS Final Rule are just a few of the several areas scheduled to be updated.

For more information about the plans for your department or section, contact your Section Administrator or call Tomicia James, Director of Audit and Education Services. To register online for our compliance education sessions, please visit the OMCC website at <http://compliance.bsd.uchicago.edu> .

IV. HIPAA Surveillance and Auditing

UCMC is committed to maintaining the privacy of our patients. The scope of the Privacy Office work plan has been expanded to focus greater attention on surveillance and audit across the medical center. Through the HIPAA Program Office, OMCC is conducting random, unannounced visits to inpatient and ambulatory units. This visit is designed to look at operations from a HIPAA compliance perspective and give on-the-spot feedback. In addition, a small percentage of the staff of that unit will be randomly selected for an EHR Appropriate Use Audit. The EHR Appropriate Use Audit will focus on a specific day and review the access of the randomly selected staff to ensure that all access to patient records was appropriate.

UCMC is committed to maintaining and enforcing our "zero tolerance policy" for privacy violations consisting of unauthorized access to patient information. The EHR Appropriate Use Audits are checking to ensure all users are pulling up the records of patients only for whom they have a need. The HIPAA Program Office urges everyone to remember that looking up a patient's protected health information (PHI) when you have no job-related reason can lead to disciplinary action, leading up to and including termination.

As a complement to Surveillance and Auditing, the HIPAA Program Office offers refresher training. For more information about the activities of the HIPAA Program Office or to schedule HIPAA Refresher Training for your area, please call us at 4-9716 or go to <http://hipaa.bsd.uchicago.edu>.

HIPAA Policy Revision: The HIPAA Steering Committee recently voted to revise our privacy policies to allow UCMC/BSD professionals with current access to our protected health information systems, the authority to view their own medical record. Please note, the policy exception only applies to your own PHI. Federal and state privacy regulations strictly prohibit you from reviewing records belonging to your spouse/partner or children.

Meet the HCIP Team
Krista M. Curell, Esq., RN
Vice President, Chief Compliance Officer
2-9785 or Krista.curell@uchospitals.edu

Tracy Volel

Associate Compliance Officer
4-4733 or tvolel@bsd.uchicago.edu

Catherine Ostapina
HCIP Senior Consultant & Director of COI
4-3424 or costapin@bsd.uchicago.edu

Tomicia James
Director- Audit and Education Services
4-1143 or tjames1@bsd.uchicago.edu

Anthony DiMaio
Director- Risk and Data Services
4-4555 or adimaio@bsd.uchicago.edu

Thank you for your continued support and cooperation with the Medical Center's Health Care Integrity Program initiatives. Please feel free to contact [Tracy Volel, Associate Compliance Officer](#) with questions (4-4733 or tvolel@bsd.uchicago.edu) about the Health Care Integrity Program.