

January 2011

# STAFF NEWSLETTER

© by Vianna Zimbel Consulting

## Beating the System?



A Customer Service Rep is overheard instructing a patient to drive the car over their wheelchair so they can get a replacement prior to the 5 year 'reasonable lifetime'.

The CSR is immediately fired from his job.

A Billing Representative 'helps' physician order documentation by completing areas on the form that were not properly answered or left blank.

She is immediately terminated from her job.

A Sales Representative offers bribes to doctor's office staff and encourages them to order items for patients that are not deemed necessary.

You know what happens here too.

You must understand your role in identifying potential problems and *zero tolerance*...because your business bills the government (think Medicare, Medicaid). Your employer has a formal written program meant to insure integrity, and it is meant to guide employees in conducting the home medical equipment business professionally and properly. That means you are also forewarned that a breach of ethical behavior is subject to discipline if not dismissal.

Your corporate compliance policies detail:

- ▶ Regular, effective staff *education and training*; with confirmation you understand that reporting ethical or legal concerns; or observation of violations is not an option but a requirement.
- ▶ Instructions about how to *anonymously submit complaints*, and procedures that protect the anonymity of complainants, and protect you from retaliation.
- ▶ The use of *audits to monitor compliance*, identify problem billing areas, and the reduction of lapses in identified problem areas.
- ▶ Appropriate *discipline* for employees who have violated internal compliance policies, regulations, or federal, state, or private payor health care program requirements.
- ▶ *Prohibitions from employing individuals* who have been found guilty of fraudulent behavior when billing the government.

You should know who your Corporate Compliance officer is, as well as how you can anonymously notify management of concerns you have regarding possible unlawful billing practices.