



Medical Billing Compliance
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Yale Docs Must Remember John Hancock

Did you know that the top error in our recent Medicaid audits was for lack of signatures on medical record documentation? The Yale

Medical Group paid back almost \$26,000 to the Medicaid Program due to unsigned medical record documentation. All healthcare providers should follow the below guidelines when documenting in the medical record.

- 1) Sign and date all medical record entries.
- 2) **Never** sign someone else's name in a medical record, prescription, order for supplies or on an encounter form.
- 3) The discipline of the person making the medical record entry should be recorded (MD, RN, etc..)
- 4) Signed copies of consultation reports should be maintained in the consultant's medical records.

Questions regarding signatures or medical record documentation may be addressed to the Compliance Office at 785-3868.

PATH Settlements Still Active

The University of Medicine and Dentistry in New Jersey has agreed to a \$1.4 million dollar settlement to resolve allegations that the school billed for services provided by residents that did not have adequate oversight by the teaching faculty physicians

Teaching physicians must provide documentary evidence that they are personally and identifiably involved in providing services for which they intend to seek Medicare reimbursement. The teaching physician's

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note must support the following concepts. The attending:

- saw the patient
- examined the patient
- participated in the plan

Canned language or generic attestations do not meet these requirements.

The chart below shows other institutions and the dollars paid back to the Feds for similar findings discovered in the Physicians At Teaching Hospitals (PATH) audits.

Institution	Settlement Amount
Beth Israel NY	\$2,300,000
Cleveland Clinic	\$4,000,000
EmCare	\$7,800,000
Flether Allen (Univ of Vermont)	\$3,000,000
Georgetown	\$5,300,000
Jefferson	\$12,000,000
John Hopkins University	\$800,000
Loma Linda University	\$2,200,000
Medical College of Wisconsin	\$8,900,000
Medical University of South Carolina	\$5,200,000
Mount Sinai NY	\$2,300,000
Penn	\$30,000,000
Pittsburgh	\$17,000,000
St. Louis Physician	\$4,100,000
Univ of California	\$22,500,000
Univ of Chicago	\$10,900,000
Univ of Florida	\$8,600,000
Univ of Kansas	\$1,500,000
Univ of Maryland	\$8,300,000
University of Medicine & Dentistry NJ	\$1,400,000
Univ of TX	\$17,200,000
Univ of VA	\$8,000,000
University of Washington	\$35,000,000
	\$218,300,000

In The News -

Connecticut Enforcement Activities on the Rise

Hillcrest Healthcare Convicted of Manslaughter

A Montville, CT nursing home was convicted in January of manslaughter after the death of a 74 year old resident who received substandard bed sore management. The nursing home is also settling a federal false claims act lawsuit with the U.S. Attorney's office for an amount rumored to be between half a million to a million dollars. The case is an example of the current focus by the feds on quality of care issues and the ability to employ the False Claims Act.

Saint Raphael's Pays \$632,006

The Hospital of St Raphael's, located in New Haven, CT, has agreed to pay the federal government \$632,006 to resolve allegations that it violated the False Claims Act by billing Medicare for unnecessary hospital stays. The Feds concluded that some of the services provided to Medicare patients could have been provided in an outpatient setting. The hospital hit the federal radar screen when statistics showed that St Raphael's admitted dialysis patients for one night stays for procedures far more often than other hospitals in Connecticut.

Operation Free Shot

In the March Alert, we reported that St Francis Hospital and Medical Center in Hartford, agreed to pay close

to \$300,000 to resolve allegations that it billed the State for childhood vaccines the hospital received for free. Since the March Alert, we have learned that two other Connecticut groups have been nabbed in the Operation Free Shot sting.

Pediatric and Adolescent Healthcare in Ansonia, CT will pay back \$501,687 and Torrington-Winsted Pediatric Associates will pay back \$354,000. Both entities signed a Corporate Integrity Agreement with the Office of the Inspector General.

Medical Billing Training – What's the Score?

All faculty must complete their medical billing training requirement by 12/31/05. If you choose to take the online training program, **a score of 75%** or higher must be attained.

Faculty can also attend a one hour seminar to meet the requirement. The next session will be held June 22, 2005 at 5pm in Brady Auditorium.

Compliance will also provide the training at one of your faculty meetings. These training sessions are specialty specific and focus on issues particular to your department.

Contact Judy Harris at 785-3868 or judy.harris@yale.edu to schedule a session.

COMPLIANCE PROGRAMS-PREVENTATIVE MEDICINE FOR HEALTH CARE PROVIDERS

Find the Alert at <http://yalemedicalgroup.org/comply>

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