

In This Issue

- Breach Prevention
- TP Guidelines Reviewed
- e-PHI Security Tip
- Lunch Discussion
September: Documentation
Tips

Compliance Hotline

Type:

<http://157.21.29.163/Compliance/>
and click on Hotline.

EVMS Medical Group Compliance concerns may also be sent to the EVMS Medical Group Compliance Office via phone, mail or e-mail.

Breach Incidents and Prevention

Over the last five fiscal years, the top three causes of a breach of PHI at EVMS Medical Group include the following:

1. Impermissible Electronic Disclosure (via social media, email, storing on a non-secure server, etc.)
2. Impermissible Disclosure to unauthorized individual (physical or verbal)
3. Stolen devices without appropriate safeguards

Many of these breaches were preventable and for others, there are additional safeguards available in the event that they do occur. Security tips for electronic PHI are included in this newsletter each month however other general guidelines for preventing impermissible disclosures of electronic health information include always using a secure means of electronic communication, password protecting and encrypting documents as necessary, and refraining from posting any work-related information on social media networks.

For physical or verbal disclosures which are not permitted, office procedures can be edited and employed to help prevent these events from happening. For example, your office may make use of reminders or procedures to double check patient identifiers when handing over prescriptions, paper appointment reminders, visit summaries, and other documents containing PHI. The same reminders would apply to preparing documents to be mailed. Posting reminders next to printers and fax machines is also a good practice to ensure that multiple patients are not included in communications intended for or about unique patients.

Finally, any devices used for the storage of PHI that are mobile or can be physically removed from the clinic area should always be physically secured with locks and/or stored in a locked space when not in use. In addition to physical security, these devices should always meet EVMS/EVMS Medical Group security standards for password protection and encryption.

Breaches of PHI and other impermissible uses or

Contact Us

EVMS Medical Group Compliance Office

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Norfolk, VA 23508
Phone 451-6200

Link to Policies & Forms:

http://www.evms.edu/patient_care/compliance_program/

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Compliance "Listserv"

Send an email to browerl@evms.edu to request to be added to the EVMS Medical Group Compliance "Listserv". Once you are subscribed, you will receive newsletters, information and training opportunity announcements directly.

disclosures do happen however we should always take every possible action to make sure that they do not. Often times small steps can completely eliminate the possibility of a breach or minimize the risk of compromise if a disclosure does occur. If you would like to schedule breach awareness or prevention training for your office staff beyond annual training the Compliance Office is always available and willing to assist in that effort.

Teaching Physician Guidelines Reviewed

The Teaching Physician Guidelines establish rules for payment of physician services in teaching environments. Payment is provided if the following conditions of these guidelines are met:

- Services are personally provided by a physician who is not a resident.
- Services are provided by a resident during which time the teaching physician is physically present during critical or key portions of the service.
- Services are furnished by a resident under the Primary Care Exception.

The most prevalent issues identified when billing for physician services in a teaching environment relate to documentation for E/M services. For E/M documentation resident notes and teaching physician notes may be combined to support the services billed however the teaching physician must attest to any documentation written by the resident to include the fact that they:

- Saw and evaluated the patient.
- Agree with the resident's documentation as written and/or would like to add the following or edit as necessary.

Per CMS, macros may be used by the teaching physician in the EHR however they should contain language that supports the requirements and as with all macro statements should be reviewed upon each use for accuracy. As we sometimes see inadequate Teaching Physician macros used, please review all current macros and send to the Compliance Office for approval if there are questions.

The CMS MLN booklet on Teaching Physician Guidelines can be located at the link below:

[CMS Guidelines for Teaching Physicians, Interns, and Residents](#)

e-PHI Security Tip

Patients who are also employees of EVMS Medical Group should never be tasked regarding their own medical information or

appointments. Since tasking is not an available means of communication for all patients, it should not be used for those who have access to Allscripts. The biggest concern with tasking an employee regarding their personal health information is that opening a task regarding his or her own medical record causes the employee to “access” their own medical record which is not permitted. If you receive a task about your own medical record, close the task and notify the Compliance Office for audit purposes and so that reeducation of staff members may take place.

Lunch Discussion Session September

Topic: Documentation Tips

Who Should Attend: Anyone who would like to discuss common documentation gaps or errors. We will cover basic requirements, recommended “templates” or attestation statements, and other often missed documentation that is required for good patient care and billing. Would apply to providers and/or billers and managers.

Date and Location:

Thursday, September 21st, 12-1:00 pm in HH 752

Please RSVP to Laura Brower at browerl@evms.edu or 451-6202 and feel free to bring your lunch!