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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.

Anthem Guideline Updates

Two recent updates relevant to documentation and billing have been received in the past few months from Anthem. The first involves information published in the August 2017 Anthem Newsletter regarding documentation for NPs billing under a physician. As we know, Anthem does not currently credential Nurse Practitioners. Because of past external audits, EVMS Medical Group's policy has been that all services performed by one provider but submitted under another provider's NPI number require a "billing provider co-signature". One of the most common billing scenarios that would require a billing provider signature is when an NP who is not credentialed provides a service that must be billed under a physician's NPI. In their August newsletter, Anthem released the following information:

"Physicians supervising the services of nurse practitioners (NP) and physician assistants (PA) should bill Anthem for the NP's or PA's services using the physician's name and 10-digit National Provider Identifier (NPI) number. The following conditions must apply in order for the services to be billed and reimbursed:

- Both the physician and the NP or PA must be licensed to render the service.
- The physician must be contracted with Anthem under the tax ID for the location where the services are rendered.
- The physician must be participating in the Anthem network(s) for the patient being seen by the NP or PA.
- The service would be covered if it had been performed by the physician.
- The NP or PA is performing services in collaboration with a participating physician, but there is no requirement for the physician to do the following.

The physician does NOT have to:

- Be on site when services are rendered
- See the patient previously
- Sign the patient's medical record"

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.

We always use the most updated guidance available to us at any given time, **therefore we will no longer require a physician billing provider signature for NPs or PAs as described above for Anthem patients only.** The standing policy still applies to services billed to all other insurance carriers.

The second update was sent to all providers in the form of a letter dated August 30, 2017 regarding copy/paste or cloning functionality. In the letter Anthem identifies this functionality as "large issue". The letter provides recommendations that are in line with our EVMS Medical Group Copy/Paste policy, which can be located at the link below:

EVMS Medical Group Copy/Paste Policy

This communication from Anthem suggests that they are actively addressing this risk area and aware of the potential misuses. If you did not receive a copy of the letter and would like to review, please contact the Compliance Office.

Providing Medical Records in Response to a Request

Requests for medical records are received on a daily basis and may come from several sources to include audits (internal and external), federal and state agencies, subpoenas, electronic information for litigation requests, and others. For internal and external audits, the request should be reviewed and all documentation needed to support the service should be included in the response. Some audits will specify the types of documents required while others will simply ask for any relevant supporting information. For audits, prior documentation that is necessary for establishing medical necessity may be appropriate to include as well. We are contractually obligated to send requested information to insurance carriers with whom we participate.

Federal and state agencies have statutory authority to request documentation from us for investigations and other purposes. It is the burden of the outside agency to provide us with the federal or state regulations requiring our compliance with the request. These requests are generally specific about what documentation is needed. Subpoenas are also specific and no documentation beyond what is requested should be provided in response to a subpoena.

An EVMS Medical Group "Can I Release?" Guide is available by request from the Compliance Office to assist with identifying different types of record requests. In general it is

important to remember that the medical record is much more than just the notes or forms for a particular date of service but can include scanned documents, tasks, schedules and other relevant information that is maintained in the electronic medical record.

e-PHI Security Tip

Access to PHI in the medical record should be limited to the "minimum necessary" required to complete the task at hand. Audit functions are available in Allscripts and they are used to identify potential inappropriate accesses of PHI. If it appears that information has been accessed without a "need to know" purpose, you may be contacted by the Privacy Office for additional information.

Lunch Discussion Session October

Topic: Diagnosis Coding and ICD-10 Updates

Who Should Attend: Anyone involved in the documentation and code selection process. We will cover this year's ICD-10 updates which go into effect on October 1st and some common diagnosis code reminders.

Date and Location:

Thursday, October 19th, 12-1:00 pm in HH 758

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