

TABLE OF CONTENTS

PART I

	Page
I. INTRODUCTION	1
A. OVERVIEW	1
B. OVERVIEW OF FEDERAL FRAUD AND ABUSE LAWS AND REGULATIONS	2
1. <i>False Statements Related to Health Care Matters</i>	3
2. <i>Anti-Kickback Statute</i>	4
3. <i>Stark Self-Referrals</i>	5
4. <i>Other Laws</i>	6
5. <i>Self Disclosure</i>	6
6. <i>Internet Resources</i>	7
C. IMPLEMENTING THE PLAN.....	9
1. <i>Auditing and Monitoring</i>	9
2. <i>Implement (Written) Practice Standards and Procedures (Policies and Procedures)</i>	11
3. <i>Designate a Compliance Officer or Contact(s)</i>	15
4. <i>Conduct Appropriate Training and Education Programs</i>	16
5. <i>Responding to Violations and Developing Corrective Actions</i>	17
6. <i>Develop a Process to Communicate</i>	18
7. <i>Enforcing Disciplinary Guidelines</i>	18
D. EMPLOYMENT HIRING AND TERMINATION.....	19
1. <i>New Employee Policy</i>	19
2. <i>Employment Termination</i>	19
E. ADDITIONAL RISK AREAS	20
1. <i>Local Medical Review Policy</i>	20
2. <i>Advance Beneficiary Notices (ABN)</i>	21
3. <i>Physician Liability for Certifications in the Provision of Medical Equipment and Supplies and Home Health Services</i>	22
4. <i>Billing for Non-Covered Services as if Covered</i>	23
5. <i>Physician Billing Practices</i>	23
6. <i>Professional Courtesy</i>	24
7. <i>Rental of Space in Physician Offices by Persons or Entities to which Physicians Refer</i>	24
8. <i>Unlawful Advertising</i>	25

TABLE OF CONTENTS

PART II

	Page
II. MODEL COMPLIANCE PLAN	1
A. INTRODUCTION	1
B. COMPLIANCE MISSION STATEMENT	1
C. COMPLIANCE PERSONNEL	2
1. <i>Compliance Officer/Contact</i>	2
2. <i>Assistant Compliance Officer/Contact</i>	3
D. TRAINING AND EDUCATION	3
1. <i>Positions Affected</i>	4
2. <i>Mandatory Attendance</i>	5
3. <i>Expense Reimbursement</i>	5
E. CODING, BILLING AND COLLECTIONS	6
1. <i>Coding and Documentation</i>	6
2. <i>Claims Submission</i>	6
3. <i>Collections</i>	7
F. COMMUNICATION AND REPORTING	7
1. <i>Dissemination of Materials</i>	7
2. <i>Questions and Concerns</i>	8
3. <i>Reporting of Violations or Suspected Violations</i>	8
4. <i>Confidentiality</i>	9
5. <i>Investigation and Remedial Action</i>	9
6. <i>Disciplinary Action</i>	10
G. AUDITING AND MONITORING	11
H. RESPONDING TO INQUIRIES	12
I. HIRING AND EMPLOYMENT TERMINATION	13
1. <i>Hiring</i>	13
2. <i>Employment Termination</i>	13

Part III

EXHIBITS

- A. DOCUMENTATION GUIDELINES
- B. COMPLIANCE OFFICER/CONTACT(S) JOB DESCRIPTION
- C. REPORTING SUSPECT CONDUCT
- D. RECORD OF COMPLIANCE TRAINING
- E. ECONOMIC HARDSHIP QUESTIONNAIRE
- F. HOW TO RESPOND TO EXTERNAL FRAUD INVESTIGATIONS AND INQUIRIES
- G. E/M DOCUMENTATION AUDITOR'S INSTRUCTIONS
- H. EXIT INTERVIEW FORM
- I. COMPLIANCE TRAINING EXPENSE REIMBURSEMENT REQUEST FORM
- J. ADVANCE BENEFICIARY NOTICE
- K. AMENDMENT TO POLICY MANUAL