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PATHOLOGISTS

Responding to Different Types of Audits

Experiences in the Pathology and Lab Community

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- **Member – Practice Management Committee**
- **Fellow in the Healthcare Financial Management Association**
- **Certified Professional Coder (CPC)**
- **ASCP Certified Medical Technologist**



Topic for Today's Discussion

- Types of Audits
- Audit Process – federal and commercial
- Proactive steps to prevent and/or defend against audit

Disclaimer

The information presented today represents the opinions of the panelists and does not represent the opinion or position of the CAP.

This should not be used as a substitute for professional assistance.

The information in this presentation is provided for educational purposes only and is not legal advice.

Courtney G. Tito, Attorney, Partner, Nelson Mullins

- **Board Certified in Health Law**
- **Counsels Clients in:**
 - Federal and commercial payor audits, disputes and investigations
 - Revocations and payment suspensions
 - Responding to federal subpoenas and civil investigative demands
 - Regulatory and compliance matters at both federal and state levels.



Types of Audits

**Fee for service
medical review
audits**

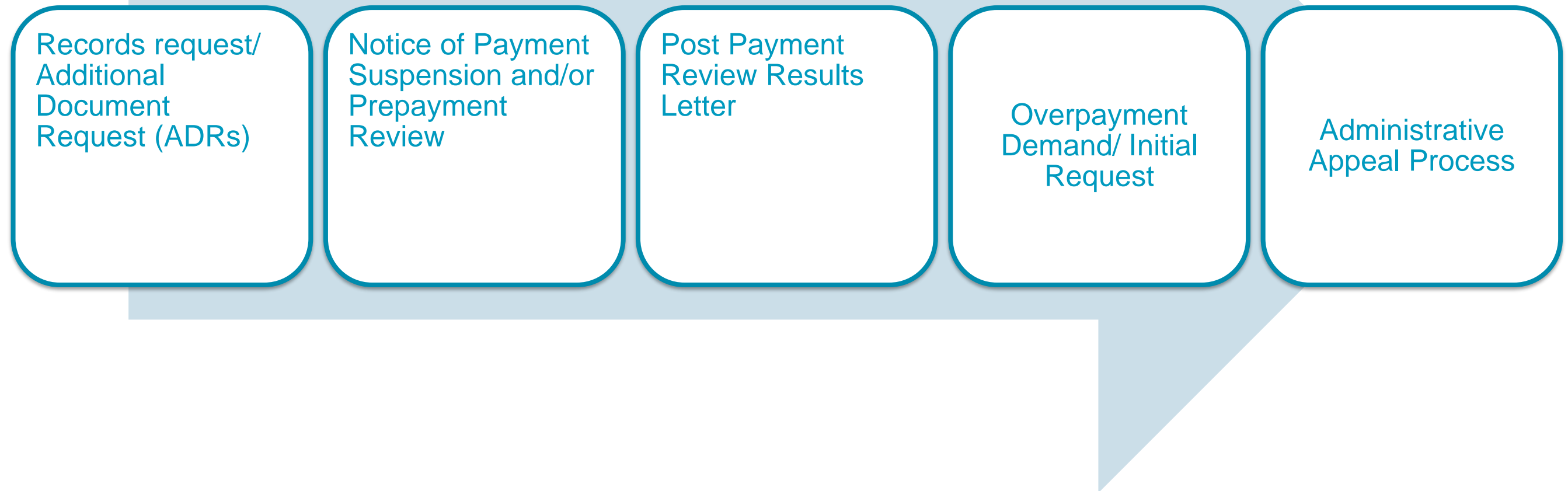
**Targeted Probe &
Educate (TPE)
audits**

**Supplemental
Medical Review
(SMR) audits**

**Recovery Audit
Contractor (RAC)
audits**

**Federal
(Medicare/Medicaid)
v. commercial
payors**

Audit Process

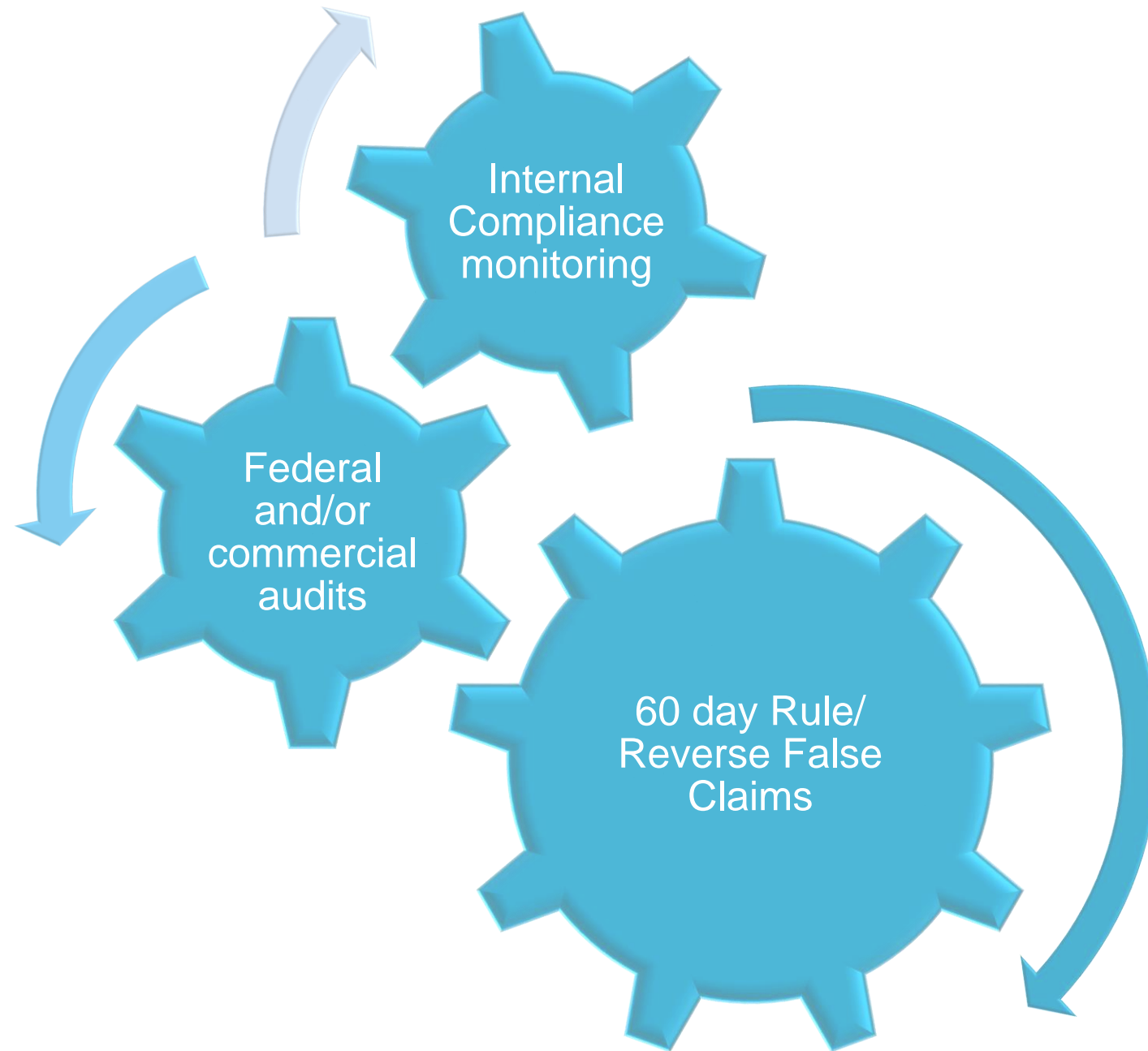


Don't forget Notices of Revocation and the 60 Day Rule

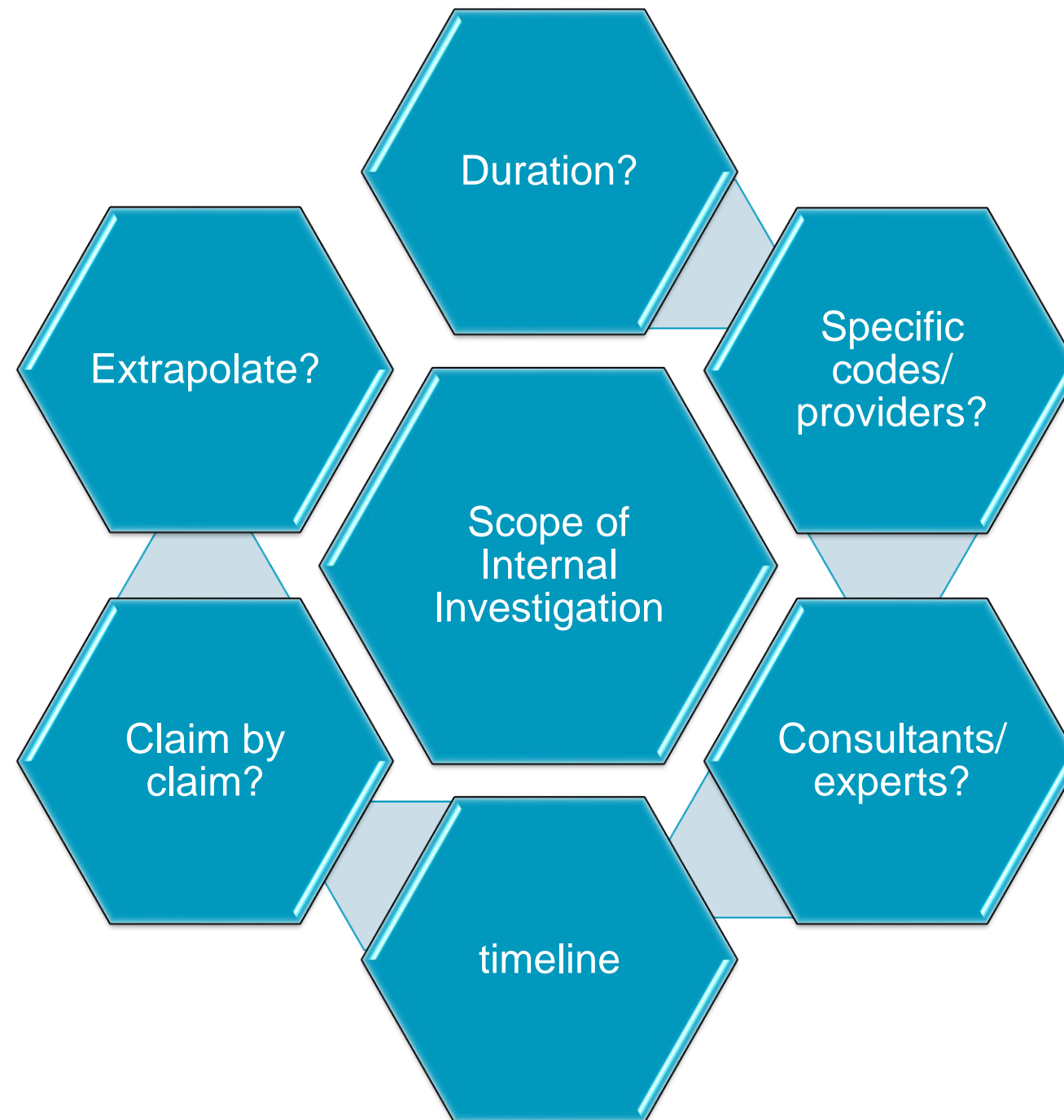
Audit process, con'd



Audit process, con'd



Audit process, con'd



Proactive Steps

Keys: Develop, Assess, Plan, Document

Policies/guidelines/procedures

Proactive compliance reviews

Appoint person/title who will be responsible (especially important for all things COVID related)

Engage counsel and consultants

DOCUMENT, DOCUMENT, DOCUMENT – remember most things health care are evidence based so if you didn't document it, it didn't happen

For all things COVID related create transition plans and policies now (*Be prepared for all COVID waivers and enforcement discretions to end upon the end of the declared public health emergency*)



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Resources

- **Practice Management Resources**

<https://www.cap.org/member-resources/practice-management>

- **Value-Based Business Toolkits**

<https://www.cap.org/member-resources/practice-management/value-based-business-toolkits>

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