

## **DO YOU NEED A MEDICARE/MEDICAID/INSURANCE FRAUD PREVENTION**

### **COMPLIANCE PLAN?**

1. Has the practice been the subject of audits or investigations in the past by any state or federal agency, managed care plan, or insurance company?
2. Does the practice's compensation formula for its members encourage aggressive coding and billing practices?
3. Does the practice routinely bill the highest or second highest CPT code(s) available for the services rendered?
4. Is the practice growing rapidly, especially expanding into specialties or services with which it has had little prior experience?
5. Has the practice had difficulty hiring (or contracting with) and retaining good administrative staff, particularly medical billing personnel?
6. Does the practice have external relationships or contracts with others which may include investments in other healthcare providers with which it may have referral relationships?
7. Does the practice bill for services performed by others when the physician is not actually present on the premises?
8. Does the practice offer a broad range of services relative to the size of the group or its administrative staff?
9. Does the practice conduct heavy or aggressive marketing and advertising?
10. Does the practice bill multiple different CPT codes for one patient visit?
11. Does the practice have any unhappy or "disgruntled" employees?
12. Does the practice give away discounts, gifts, or promotional items having any independent value?

13. Does the medical practice use an outside billing agency which does its billings for it? If so, is the billing company's fee based on a percentage of its billings or collections?
14. Are the group's regulatory obligations complex, difficult to understand or frequently changing?
15. Is the practice involved in an area of medicine (e.g., home health visits, durable medical equipment, diagnostic testing) where audits and enforcement actions are common?
16. Do medical practice members disagree with each other about the necessity of regulatory compliance?
17. Is the practice experiencing any regulatory problems (OSHA, Labor, etc.)?
18. Does the practice employ or contract with a driver and/or van service to pick up and deliver patients?

If you answered "yes" to any of these questions for your practice, you probably need a compliance plan.

**COMPLIMENTS OF:**

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