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PART 1: DEVELOPING A CULTURE OF COMPLIANCE AND WRITTEN COMPLIANCE PROGRAM

WHY COMPLIANCE?



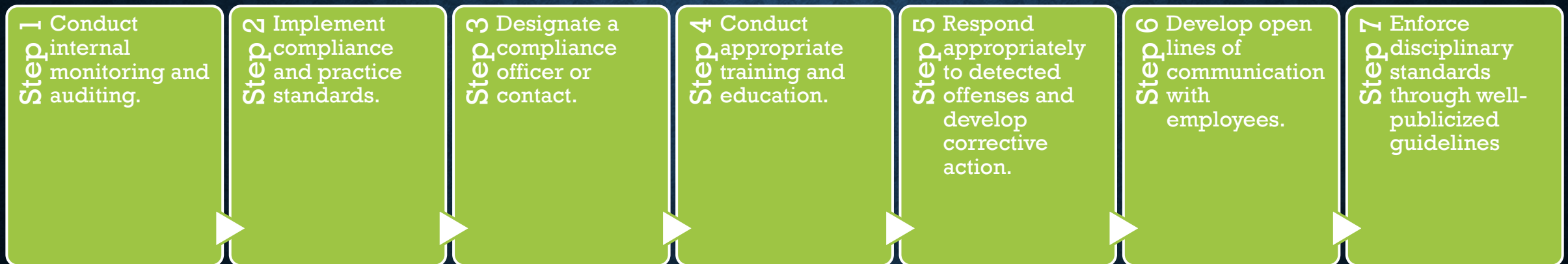
COMPLIANCE PURPOSE

- Compliance helps your organization avoid waste, fraud, and other practices that disrupt operations and put your company at risk.
- Most of the time, compliance gets a bad rap because it is immediately associated with law, constraints, audits, and consequences for those who don't follow the rules. The word compliance in itself often conjures up thoughts of what organizations must do rather than what they want to do.
- An organization that is aware of their compliance plan usually finds fewer billing and coding mistakes, their documentation accuracy improves and their chances for failing an audit decrease.



WHAT IS A COMPLIANCE PLAN?

- Steps that a provider, organization or practice establishes to ensure adherence to federal and state regulations. Office of Inspector General (OIG) developed voluntary compliance program guidance in an effort to help organizations with their compliance programs. This resource assists in setting the foundation for an effective program.
- Make sure that Auditing is a major part of the compliance plan.



HOW IS IT EFFECTIVE?

- An effective and successful compliance plan should outline each of the seven elements and include directions, standards, and policies for how each element is handled.
- If an area of non-compliance is found, detailed records of the incident or misconduct should be documented with the date, name of the person that reported the issue, the person who initiated action on the issue, and any corrective or follow-up action that was taken.
- Include your Core Values in your Compliance program.

WHY CULTURE?



IMPORTANCE OF CULTURE IN COMPLIANCE

Where **culture** is favorable, behaviors are more desirable in terms of policy **compliance**, risk prevention, whistleblowing and accountability. Building a **compliance culture** is a process to prioritize risks and educate managers and employees to perform controls to manage those risks.

Nearly all organizations provide some level of training to employees, but a **culture of compliance** goes beyond once-a-year mandated training. It embeds **compliance** into everyday workflow and sets the foundation and expectations for individual behavior across an organization.

Tying compliance back to your Core Values continuously reinforces the culture of compliance within your organization.

Compliance should not be an “after thought”.



Potential Compliance Audit Checklist

- Define successful compliance in your core processes for this audit checklist

Master Contract
Grid / Payor
Policy Rules

New Employee
Onboarding
Audit

New
Client/Intake
Process Audit

Scheduling rules
(authorizations,
client set up)

Session note
quality Testing
Audit

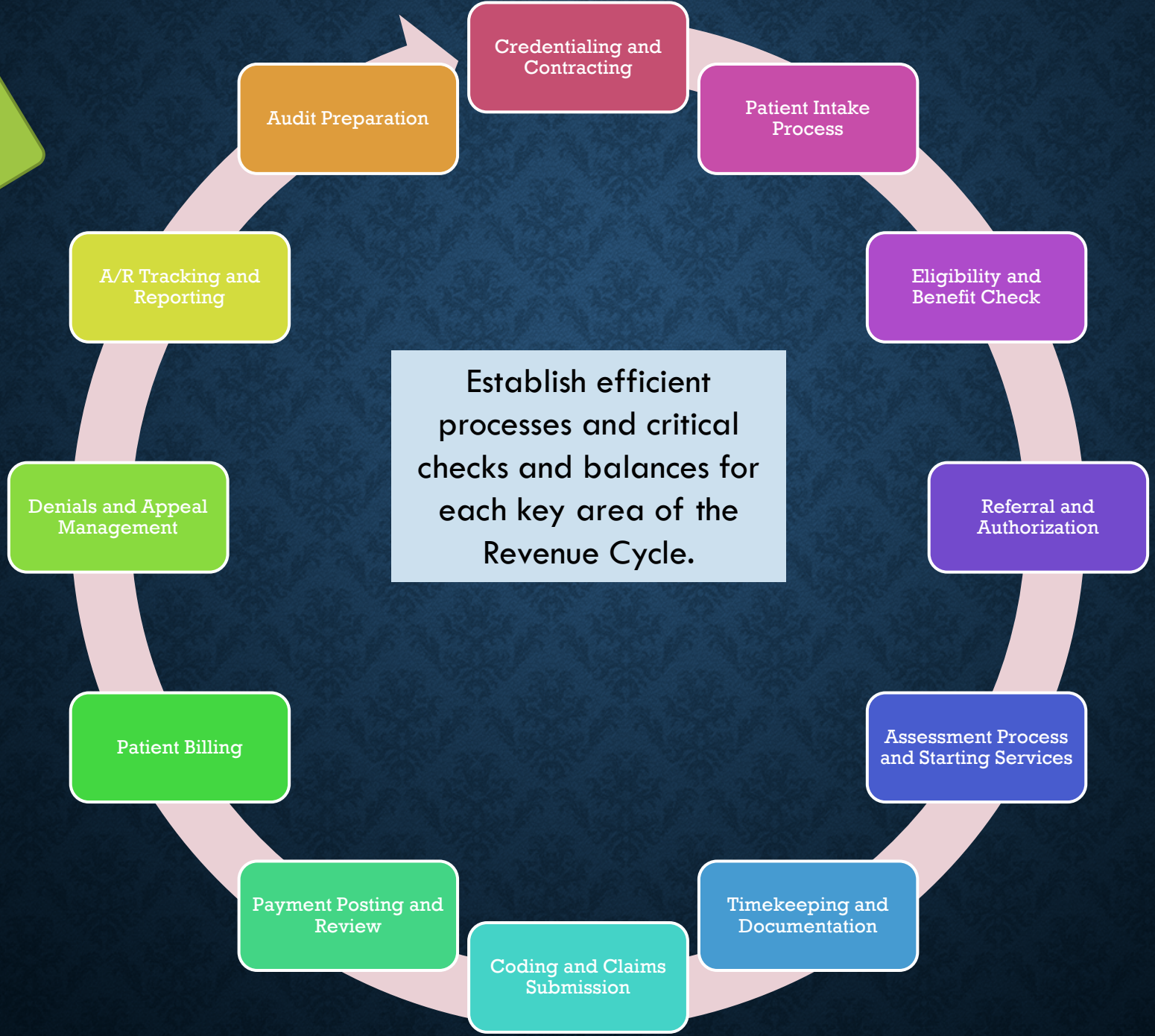
Claims/billing
submission
Testing Audit

Payment
Reconciliation
Testing Audit

WHY YOUR RCM TEAM?



Everyone has a Role



REVENUE CYCLE MANAGEMENT'S SUPPORT FOR COMPLIANCE

- With all states having mandates that require some level of insurance coverage for the treatment of autism, providers have turned to health care funders as a primary source of reimbursement for services.
- Building a culture of compliance within your Revenue Cycle Management team can aid in creating a collaborative force in identifying and solving obstacles before they become risks and barriers to care.
- Functions and roles within the revenue cycle management can contribute to adhering to compliance standards which can build confidence in helping providers stay out of harm's way of fraudulent activity.

HOW CAN EACH RCM FUNCTION HELP?

Credentialing and Contracting

- Maintain a Master grid of all Contract key information, Payor Policies, and Credentialed providers and keep it updated
- Credential new hires and communicate with Clinical team on progress
- Prompt providers to keep CAQH attested
- Follow re-credentialing contract requirements

Intake and Authorization

- Access accurate information on eligibility checks and communicate financial responsibility to families
- Obtain authorizations for credentialed providers for In Network contracts
- Ensure there are no authorization gaps and that authorization billing codes match the treatment plan description of services
- Update authorizations if case supervisors change

Billing

- Audit session notes
- Code accurately or audit software auto-coding
- Submit claims based on Payor policies
- Stay educated in code changes (CPT and ICD10), updates and use by individual funding sources
- Report and correct mistakes timely
- File appeals in a timely manner
- Audit areas where trends are noticed in denials

RESOURCES

- **ABA Coding Coalition:** <https://abacodes.org/>
- **Autism Law Summit:** <https://www.autismlawsummit.com/>
- **Association for Professional Behavior Analysts:** <https://www.apbahome.net/>
- **ABA Therapy Billing and Insurance Services** (blogs and webinars:
<https://www.ababilling.net/>
- **Council for Autism Service Providers:** <https://casproviders.org/>