



Fall Means Annual Compliance Trainings

Mandatory Compliance and Privacy/Security education is underway! This year's topics include required refreshers on the Code of Conduct and State Code of Ethics, prevention of fraud, waste and abuse, and the importance of protecting confidential information.

Education is our first line of defense to prevent negative publicity and costly compliance violations and, for that reason, remains a key part of the Compliance Program. The more knowledgeable faculty, staff, and administrators are regarding the complex laws and compliance issues facing academic health centers, the better equipped UConn Health is to ensure ongoing compliance.

To access the online courses go to: <http://saba.uhc.edu> and follow these steps:

- ✚ Log in using your UConn Health Domain login name and password.
- ✚ View "Current Enrollments" on the right side of the page for a listing of all assigned courses
- ✚ Click "Launch Now" to begin a course.
- ✚ Once you have completed a course click the "Home" tab to view additional course assignments.

Mandatory compliance education must be completed by January 15, 2015.

For training questions please contact Ginny Pack at 860-679-1280 or pack@uchc.edu or Melanie O'Connor at 860-679-4180 or mconnor@uchc.edu

For technical issues with Saba, please contact Chris Desjardins at 860-679-7577 or cdesjardins@uchc.edu or the UConn Health IT Helpdesk at 860-679-4400.

Compliance Expectations and Goals

Everything you need to know about what is expected of a UConn Health workforce member can be found in the Compliance Expectations and Goals policy. This policy covers the basics for personal conduct and communication and reinforces the standards set to provide high quality health care, research and education in a safe and respectful environment. Individual responsibility will assure institutional success.

Please take time to review the UConn Health policy on Compliance Expectations and Goals at this link, http://www.policies.uhc.edu/policies/policy_2003_35.pdf

Peg DeMeo, Associate Clinical Compliance Officer, x1226, Demeo@uchc.edu





Reporting Compliance Concerns

UConn Health strives to maintain the highest standards of ethical conduct, professionalism and quality in all activities. In order to fulfill this mission, reporting compliance concerns in the manner outlined in Policy #2003-33 Reporting Compliance Concerns http://www.policies.uhc.edu/policies/policy_2003_33.pdf helps to achieve this goal, as well as ensure compliance with all laws, regulations, standards, policies and procedures.

Effective implementation of this policy requires that reports of compliance concerns include the chain of command within the operating structure of an employee's department and the Compliance Office. Individuals who would like to remain completely anonymous, may call **REPORTLINE at 1-888-685-2637**, a confidential service operated by a private (non-UConn Health) company, which forwards information to the Compliance Office. We also recognize that everyone has the right to report concerns directly to the state or federal government. Using internal mechanisms however, provides UConn Health with the opportunity to address and correct non-compliant activities in a timely and efficient manner.

If you are aware of a compliance violation, you are obligated to report it. Participating in activities that you know are non-compliant or suspect may be non-compliant creates individual risk for you as well as risk to the institution. Reporting known or potential compliance violations to a supervisor without satisfactory resolution of the concern does not relieve you of personal responsibility, should you continue to participate in a potentially non-compliant practice. When you have a concern about any business practice, process or behavior that you believe may not be compliant with current laws, regulations, standards, policies and/or procedures, reporting the concern and obtaining clear directions for its correction is required.

Please direct any questions about this article to Iris Mauriello RN, CHC Compliance Integrity & Privacy Officer, x3501 mauriello@uchc.edu

Medicare (NGS) Audits on In-Patient Rhythm Electrocardiographic Recording (ECG)

National Government Services Medical Review Department has been conducting a prepayment review of cardiology providers billing of CPT code 93040, Rhythm ECG, 1-3 leads; interpretation and report only in the in-patient setting. The results of their review are as follows:

Month	Services Billed	Services Reduced or Denied	Error %
July, 2014	132	130	99.1%
August, 2014	1,112	1096	98.5%
September, 2014	994	986	99.3%

Errors were due to:

- Lack of required specific order for an ECG rhythm strip followed by a separate signed, written and retrievable report
- Lack of documentation summarizing the telemetry strip findings.

The CPT Manual states that to document *Codes 93040-93042 the following are required:*

- *the test is triggered by an event,*
- *the rhythm strip is used to help diagnose the presence or absence of an arrhythmia, AND*
- *a report is generated. There must be a specific, signed, written and retrievable report.*

It is not appropriate to use these codes for reviewing the telemetry monitor strips taken from a monitoring system. The need for an ECG or rhythm strip should be supported by documentation in the patient medical record.

For documentation questions or concerns, please contact Janice McDonnell, Compliance Specialist at X4093 or jmcdonnell@uchc.edu